

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF PENNSYLVANIA
4 PHILADELPHIA COUNTY
5 CASE NO. 19-04078-RBS

6 -----x
7 EVELYN CINTRON,

8 Plaintiff,

9 v.

10 CITY OF PHILADELPHIA, et al,

11 Defendants.
12 -----x

13 1717 Arch Street

14 Philadelphia, Pennsylvania

15 October 28, 2022

16 11:03 a.m.

17 VIDEOTAPED DEPOSITION of EVELYN
18 CINTRON, the Plaintiff, held at the
19 above-entitled time and place, taken before
20 Carolyn Crescio, a Professional Shorthand
21 Reporter and Notary Public of the State of
22 Pennsylvania.

23 * * *

<p style="text-align: right;">Page 2</p> <p>1 2 APPEARANCES: 3 4 MINCEY, FITZPATRICK & ROSS, LLC 5 Attorneys for Plaintiff 6 1650 Market Street 7 Suite 3600 8 Philadelphia, Pennsylvania 19103 9 BY: ISAAC H. GREEN, ESQ. 10 11 O'HAGAN MEYER 12 Attorneys for Defendant Police Athletic League 13 1717 Arch Street 14 Suite 3910 15 Philadelphia, Pennsylvania 19103 16 BY: KEVIN L. GOLDEN, ESQ. 17 18 CITY OF PHILADELPHIA LAW DEPARTMENT 19 Attorneys for Defendant City of Philadelphia and 20 Joseph Sullivan 21 1515 Arch Street 22 16th Floor 23 Philadelphia, Pennsylvania 19102 24 BY: SHARON ULAK, ESQ. 25 26 ALSO PRESENT: 27 DENZEL SINCLAIR, Videographer 28 29 CANDACE HARDY, Esq. 30 31 32 33 34 35</p>	<p style="text-align: right;">Page 4</p> <p>1 E. CINTRON 2 of the City of Philadelphia and 3 Joseph Sullivan. 4 MR. GREEN: Isaac Green on behalf 5 of plaintiff, Evelyn Cintron. 6 THE VIDEOGRAPHER: The court 7 reporter, Carolyn Crescio, will now 8 swear the witness. 9 10 EVELYN CINTRON, the witness herein, 11 after having been first duly sworn by a Notary 12 Public of the State of Pennsylvania, was examined 13 and testified as follows: 14 BY THE COURT REPORTER: 15 Q. Please state your name for the 16 record. 17 A. Evelyn Cintron. 18 EXAMINATION 19 BY MR. GOLDEN: 20 Q. Good morning, Ms. Cintron. 21 A. Good morning. 22 Q. My name is Kevin Golden. We met off 23 the record a couple minutes ago. Can I ask, 24 have you ever been deposed before, a situation 25 like this, a deposition?</p>
<p style="text-align: right;">Page 3</p> <p>1 2 THE VIDEOGRAPHER: All right. We 3 are now on the record. My name is 4 Denzel Sinclair. I'm the 5 videographer retained by -- on the 6 record. 7 This is a video deposition 8 through the United States District 9 Court of the Eastern District of 10 Pennsylvania. 11 Today's date is October 28, 2022. 12 The time is 10:59 a.m. 13 This deposition is being held at 14 1717 Arch Street, Philadelphia, PA, 15 in the matter of Evelyn Cintron 16 versus the City of Philadelphia, et 17 al. The deponent is Evelyn Cintron. 18 Will all counsel please identify 19 themselves for the record. 20 MR. GOLDEN: My name is Kevin 21 Golden of O'Hagan Meyer. I'm joined 22 by my colleague, Candace Hardy. We 23 represent the defendant, Police 24 Athletic League. 25 MS. ULAK: Sharon Ulak on behalf</p>	<p style="text-align: right;">Page 5</p> <p>1 E. CINTRON 2 A. Yes. 3 Q. Okay. Approximately how long ago 4 were you last deposed? 5 A. I don't recall. 6 MR. GREEN: Excuse me, Kevin, I 7 don't mean to interrupt. I just 8 want to just, at least for purposes 9 of the record, reserve my client's 10 right to read and sign. 11 Q. Ms. Cintron, what I would like to do 12 is, before we get started, go over some ground 13 rules that will hopefully make today's 14 deposition move a little bit more smoothly, and 15 make sure that we kind of understand each other 16 as we work through the day. 17 To your left you'll see the court 18 reporter. She will be taking down everything 19 that I am saying and everything that you are 20 saying, so I'm going to do my very best not to 21 interrupt you when you are giving me an answer. 22 And I would ask that, at the same time, if I'm 23 in the question, you allow me to finish the 24 question. You may sometimes know where I'm 25 going with the question. You may know exactly</p>

<p style="text-align: right;">Page 6</p> <p>1 E. CINTRON</p> <p>2 what I want to ask, but in order to prevent us</p> <p>3 from talking over each other, which makes the</p> <p>4 court reporter's job more difficult, I would</p> <p>5 like to -- I'm going to do my best to make sure</p> <p>6 I don't interrupt you, and hopefully we can work</p> <p>7 that way, we are not talking over each other,</p> <p>8 okay?</p> <p>9 A. Okay.</p> <p>10 Q. If I ask you any questions that you</p> <p>11 do not understand, if I've used a term, or the</p> <p>12 question itself you don't understand it, please</p> <p>13 just let me know. I'll do my best to rephrase</p> <p>14 and reask it in a way that is more clear for</p> <p>15 you. Does that make sense?</p> <p>16 A. Yes.</p> <p>17 Q. I don't want you to have to guess.</p> <p>18 So if I ask you a question and you don't know</p> <p>19 the answer, it's quite fine to say, I don't</p> <p>20 know. If you feel that it would help to say,</p> <p>21 Well, I don't know whether it was between X and</p> <p>22 Y, with an approximation, that's fine. I only</p> <p>23 want to ask -- I only want to know from you the</p> <p>24 things you actually know.</p> <p>25 If we get to a point where you need to</p>	<p style="text-align: right;">Page 8</p> <p>1 E. CINTRON</p> <p>2 tell me, are you today currently employed?</p> <p>3 A. No.</p> <p>4 Q. Working backwards, what was the last</p> <p>5 job that you held?</p> <p>6 A. I recently worked a few months at</p> <p>7 Sephora as a beauty adviser.</p> <p>8 Q. You know what, let me step back with</p> <p>9 another question.</p> <p>10 Do you currently reside in the state of</p> <p>11 Pennsylvania?</p> <p>12 A. No.</p> <p>13 Q. Which state do you reside in?</p> <p>14 A. Georgia.</p> <p>15 Q. And how long have you been in</p> <p>16 Georgia?</p> <p>17 A. I've been there since 2017, 2018,</p> <p>18 when I left the job.</p> <p>19 Q. And when you say, "left the job," do</p> <p>20 you mean with the City of Philadelphia?</p> <p>21 A. Yes.</p> <p>22 Q. The position that you held with</p> <p>23 Sephora, do you know approximately how long you</p> <p>24 held that?</p> <p>25 A. I think it was just four months.</p>
<p style="text-align: right;">Page 7</p> <p>1 E. CINTRON</p> <p>2 take a break, that's quite fine. Just let me</p> <p>3 know, and we will work with you to take that</p> <p>4 break, for whatever reason. I don't need to</p> <p>5 know what that reason is. The only question I</p> <p>6 would -- pardon me, the only reservation I would</p> <p>7 make is that if I have a question that I've</p> <p>8 asked, that we allow you to answer that question</p> <p>9 before we take the break. Is that okay for you?</p> <p>10 A. Yes.</p> <p>11 Q. And the last, I guess, ground rule,</p> <p>12 I would say, is because the court reporter is</p> <p>13 transcribing all of our exchanges, I'd ask that</p> <p>14 everything that you say -- and I'll do the best</p> <p>15 from my end -- is to make sure all of your</p> <p>16 responses are verbal. If you sometimes shake</p> <p>17 your head or nod, that's general -- I mean,</p> <p>18 people normally communicate that way, but it's</p> <p>19 harder to reflect it on the record. So at some</p> <p>20 point I may need to say to you, Oh, is that a</p> <p>21 "yes" or is that a "no"? But just generally</p> <p>22 speaking, if you could try, make sure all your</p> <p>23 responses are verbal. Is that okay?</p> <p>24 A. Yes.</p> <p>25 Q. All right. Ms. Cintron, can you</p>	<p style="text-align: right;">Page 9</p> <p>1 E. CINTRON</p> <p>2 Q. And was that in 2022 or 2021, if you</p> <p>3 recall?</p> <p>4 A. 2022.</p> <p>5 Q. And what was -- did you hold a</p> <p>6 position -- any jobs before working in Sephora?</p> <p>7 A. I worked for Off Duty Management.</p> <p>8 Q. And do you recall --</p> <p>9 A. That was approximately 2020.</p> <p>10 Q. And do you know how long you held</p> <p>11 that job?</p> <p>12 A. Six months, approximately.</p> <p>13 Q. Was the position with Sephora, was</p> <p>14 that an hourly or salary position?</p> <p>15 A. Hourly.</p> <p>16 Q. And do you recall what that hourly</p> <p>17 rate was?</p> <p>18 A. Seventeen dollars an hour.</p> <p>19 Q. Did you have a set schedule or could</p> <p>20 it change from week to week?</p> <p>21 A. It fluctuated.</p> <p>22 Q. And the job with Off Duty</p> <p>23 Management, was that an hourly or a salary?</p> <p>24 A. It was salary.</p> <p>25 MR. GOLDEN: Let's do PAL-1.</p>

<p style="text-align: right;">Page 10</p> <p>1 E. CINTRON</p> <p>2 (Off Duty Management letter is</p> <p>3 received and marked as Exhibit PAL-1</p> <p>4 for identification, as of this</p> <p>5 date.)</p> <p>6 Q. Ms. Cintron, just so you know, I'm</p> <p>7 going to have the court reporter put a label on</p> <p>8 it, and then she will allow you to look at it.</p> <p>9 A. Okay.</p> <p>10 Q. You can familiarize yourself with</p> <p>11 it.</p> <p>12 Ms. Cintron, is this -- is this a -- let</p> <p>13 me step back. This is a record we obtained from</p> <p>14 Off Duty. Does this appear to be the offer</p> <p>15 letter that extended you the employment with Off</p> <p>16 Duty?</p> <p>17 A. It appears to be, yes.</p> <p>18 Q. And does the start date of</p> <p>19 August 19, 2019, is that approximately when you</p> <p>20 began working with Off Duty?</p> <p>21 A. Yes.</p> <p>22 Q. And this says there was a salary, a</p> <p>23 base salary of 66,000. Is that accurate?</p> <p>24 A. Yes.</p> <p>25 Q. When you held this position, was</p>	<p style="text-align: right;">Page 12</p> <p>1 E. CINTRON</p> <p>2 Q. Okay. So the company would do that.</p> <p>3 Your position was to work to obtain other</p> <p>4 clients; is that correct?</p> <p>5 A. Yes. And they would feed us the</p> <p>6 clients to work with.</p> <p>7 Q. Was there -- apart from the Sephora</p> <p>8 and Off Duty Management positions, have you held</p> <p>9 any other jobs since the end of your employment</p> <p>10 with the City of Philadelphia?</p> <p>11 A. No. When I left Off Duty</p> <p>12 Management, I was in good standing, and I had</p> <p>13 over \$30,000 in compensation that they owed me.</p> <p>14 And when we went to the Chief of Police</p> <p>15 Association Conference, my boss, Greg Doran,</p> <p>16 spoke to Deputy Commissioner Coulter. And after</p> <p>17 being given a great review of how I was doing</p> <p>18 with this company, a few days later I was</p> <p>19 terminated.</p> <p>20 Q. That -- you mentioned -- what was</p> <p>21 the name of that conference you were attending?</p> <p>22 A. It was the Chief of Police</p> <p>23 Conference. And while I was in -- I forgot what</p> <p>24 state I was in with one of my coworkers, Greg</p> <p>25 Doran attended the Chief of Police Conference, I</p>
<p style="text-align: right;">Page 11</p> <p>1 E. CINTRON</p> <p>2 there any other pay that you received, like</p> <p>3 overtime, bonuses, anything apart from the base</p> <p>4 salary?</p> <p>5 A. I was supposed to receive bonuses,</p> <p>6 but they never paid me for my bonuses.</p> <p>7 Q. And this -- the position was a</p> <p>8 business-development manager; is that correct?</p> <p>9 A. They manage overtime hours for</p> <p>10 police departments throughout country.</p> <p>11 Q. And just so I'm clear, was your</p> <p>12 title the business-development manager?</p> <p>13 A. Yes.</p> <p>14 Q. And, generally, can you tell me what</p> <p>15 the -- what that position entailed?</p> <p>16 A. Greg Doran recruited me from</p> <p>17 LinkedIn. And my job was to basically secure</p> <p>18 accounts for -- from the different police</p> <p>19 departments for the company.</p> <p>20 Q. And so when you say to get those</p> <p>21 accounts, I think, if I understand you</p> <p>22 correctly, it would be accounts where you would</p> <p>23 manage those police departments' overtime?</p> <p>24 A. I wouldn't manage the overtime. The</p> <p>25 company would.</p>	<p style="text-align: right;">Page 13</p> <p>1 E. CINTRON</p> <p>2 believe here in Philadelphia, where he met</p> <p>3 Deputy Commissioner Coulter and had a</p> <p>4 conversation with him about me. And the next</p> <p>5 thing you know, that Monday, I was told that</p> <p>6 they no longer needed me.</p> <p>7 Q. And so Mr. Doran -- so your</p> <p>8 employment at that time was terminated by Off</p> <p>9 Duty?</p> <p>10 A. Well, basically, they told me they</p> <p>11 didn't need me no more, and they claimed it was</p> <p>12 because of my performance, on that Monday. But</p> <p>13 that Friday they had -- we had a meeting, and I</p> <p>14 was given praise about how well I was doing --</p> <p>15 until he had a conversation with Deputy</p> <p>16 Commissioner Coulter of the Philadelphia Police</p> <p>17 Department.</p> <p>18 Q. And so that conference, would it</p> <p>19 have occurred in 2020?</p> <p>20 A. I believe so.</p> <p>21 Q. And it was here in Philadelphia?</p> <p>22 A. I believe this is where he spoke to</p> <p>23 her, yes.</p> <p>24 Q. And that's Deputy Commissioner</p> <p>25 Coulter, correct?</p>

<p style="text-align: right;">Page 14</p> <p>1 E. CINTRON</p> <p>2 A. Yes.</p> <p>3 Q. What did -- did Deputy Commissioner</p> <p>4 Coulter tell you about that conversation?</p> <p>5 A. No. My coworker, Jeff.</p> <p>6 Q. What is Jeff's last name?</p> <p>7 A. I don't recall.</p> <p>8 Q. He's an employee of Off Duty?</p> <p>9 A. Yes.</p> <p>10 Q. And can you tell me what you</p> <p>11 remember Jeff told you about that conversation?</p> <p>12 A. He stated that while our boss, Greg</p> <p>13 Doran, was at the conference, he met my previous</p> <p>14 boss, Deputy Commissioner Coulter, and that he</p> <p>15 had a conversation with her about me. And he --</p> <p>16 and that Greg Doran had told him that. And he</p> <p>17 basically was telling me, Prepare, because I</p> <p>18 don't know what that's all about.</p> <p>19 Q. Did he tell -- did Jeff tell you --</p> <p>20 I just want to try to be clear -- did Jeff tell</p> <p>21 you what Greg told Deputy Commissioner Coulter?</p> <p>22 A. No. He was just basically giving me</p> <p>23 a heads-up, and it wasn't good because -- based</p> <p>24 on his conversation with Greg.</p> <p>25 Q. So this was a conversation, as Jeff</p>	<p style="text-align: right;">Page 16</p> <p>1 E. CINTRON</p> <p>2 did not relay what was the content -- context of</p> <p>3 that conversation.</p> <p>4 Q. And so he didn't relay the contents</p> <p>5 of the conversation between Greg and Deputy</p> <p>6 Commissioner Coulter, correct?</p> <p>7 A. Yes. He just told me -- giving me</p> <p>8 the heads-up, Prepare, because it doesn't sound</p> <p>9 good.</p> <p>10 Q. Do you recall the conference you</p> <p>11 were attending, the name of what that conference</p> <p>12 was?</p> <p>13 A. It was -- basically, they had, like,</p> <p>14 different conferences about, you know,</p> <p>15 equipment, police equipment, and they would send</p> <p>16 us to get leads from those places. I can't</p> <p>17 recall exactly where I was at. I believe it</p> <p>18 might have been -- I don't remember. We went to</p> <p>19 so many places, I can't recall which one I was</p> <p>20 at, at that time.</p> <p>21 Q. So -- and then can you tell me how</p> <p>22 your employment -- what happened next? Did Greg</p> <p>23 call you? Like, how did your employment with</p> <p>24 Off Duty terminate?</p> <p>25 A. Well, Friday, prior to that Monday</p>
<p style="text-align: right;">Page 15</p> <p>1 E. CINTRON</p> <p>2 related to you, that he either participated in</p> <p>3 or overheard between Mr. Doran and Deputy</p> <p>4 Commissioner Coulter?</p> <p>5 A. No. This is a conversation that</p> <p>6 Greg Doran had with Jeff over the phone, while</p> <p>7 we were at a different location at a different</p> <p>8 conference.</p> <p>9 Q. So if I understand it correctly,</p> <p>10 Greg called Jeff and relayed the conversation he</p> <p>11 had with Deputy Commissioner Coulter?</p> <p>12 A. Yes.</p> <p>13 Q. And then Jeff called you and said,</p> <p>14 Heads-up, doesn't sound like that was a good</p> <p>15 conversation?</p> <p>16 A. No. When we were at the conference</p> <p>17 we had to be there several days. And,</p> <p>18 apparently, Jeff spoke to Greg Doran the night</p> <p>19 before. So when we got together in the morning</p> <p>20 to go to our next location, he explained to me</p> <p>21 that he had received a call from Greg Doran, and</p> <p>22 that Greg Doran had told him that he had spoken</p> <p>23 to Deputy -- that he had met and spoken to</p> <p>24 Deputy Commissioner Coulter at this event. And</p> <p>25 that they had a conversation about me. But he</p>	<p style="text-align: right;">Page 17</p> <p>1 E. CINTRON</p> <p>2 where I received the call that I was no longer</p> <p>3 needed, we had a conference call where Greg</p> <p>4 would talk to everyone on the line about</p> <p>5 everyone's achievements and celebrate the</p> <p>6 achievement. And that Friday, he gave me my</p> <p>7 props about how great I was doing, how many</p> <p>8 accounts I had secured. And he even mentioned</p> <p>9 the bonus that I would receive. And that</p> <p>10 Monday, to my surprise, he called and told me</p> <p>11 that I was no longer needed, and said the</p> <p>12 opposite of what he had said Friday, which was</p> <p>13 my performance, which was not true.</p> <p>14 Q. In that call on Friday, did he</p> <p>15 explain to you what the amount of that bonus</p> <p>16 would be?</p> <p>17 A. I was expecting at least \$33,000.</p> <p>18 Q. So Off Duty, there was the base</p> <p>19 salary, bonus eligibility. Any other, like,</p> <p>20 401(k) or profit-sharing plans that you were</p> <p>21 entitled to?</p> <p>22 A. No.</p> <p>23 Q. Did the company provide any kind of</p> <p>24 health or dental insurance?</p> <p>25 A. No. I believe they do, but because</p>

<p style="text-align: right;">Page 18</p> <p>1 E. CINTRON</p> <p>2 I was a new employee, I wasn't qualified for it</p> <p>3 at the time.</p> <p>4 Q. So was it, in your understanding,</p> <p>5 like a probationary term?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Do you currently have health</p> <p>8 or dental insurance?</p> <p>9 A. I have health and dental insurance</p> <p>10 for another two years through the city. They</p> <p>11 extend health care and dental care for five</p> <p>12 years after you leave the job.</p> <p>13 Q. Let me back up. The position with</p> <p>14 Sephora, can you tell me how that ended?</p> <p>15 A. I had to resign due to medical</p> <p>16 reasons.</p> <p>17 MS. ULAK: I'm sorry. What was</p> <p>18 the last word?</p> <p>19 THE WITNESS: Medical reasons.</p> <p>20 MS. ULAK: Oh, okay. Thank you.</p> <p>21 Q. And trying to be respectful of that</p> <p>22 line of inquiry, are those medical reasons -- do</p> <p>23 they currently prevent you from working?</p> <p>24 A. Yes.</p> <p>25 Q. May I ask, what is that condition?</p>	<p style="text-align: right;">Page 20</p> <p>1 E. CINTRON</p> <p>2 was here in Philadelphia.</p> <p>3 MR. GREEN: Excuse me. Can we go</p> <p>4 off the record for one second?</p> <p>5 MR. GOLDEN: Sure.</p> <p>6 THE VIDEOGRAPHER: The time is</p> <p>7 11:19. We are now off the record.</p> <p>8 (A break was taken.)</p> <p>9 THE VIDEOGRAPHER: The time is</p> <p>10 11:20. We are now on the record.</p> <p>11 Q. Prior to Russell Medical Group, can</p> <p>12 you tell me the name of the doctors or</p> <p>13 therapists that you were treating with as it</p> <p>14 relates to your PTSD and anxiety?</p> <p>15 A. Yes. When I first started getting</p> <p>16 the symptoms, I told my doctor at Holmesburg</p> <p>17 Medical, Dr. Carter. And based on my symptoms</p> <p>18 and complaints that I was having, he told me</p> <p>19 that he thought I had anxiety or depression.</p> <p>20 And he referred me to the proper doctor to --</p> <p>21 for proper diagnosis.</p> <p>22 Q. And what was the name of the doctor</p> <p>23 to whom he referred you?</p> <p>24 A. He referred me to Philmont Guidance</p> <p>25 Center. While there, I received counseling from</p>
<p style="text-align: right;">Page 19</p> <p>1 E. CINTRON</p> <p>2 A. Well, I have PTSD due to job-related</p> <p>3 stress. And I get anxiety. I can't sleep at</p> <p>4 night so it prevents me from properly</p> <p>5 functioning sometimes at work. And I was</p> <p>6 getting headaches because of my thyroid</p> <p>7 condition.</p> <p>8 Q. Ms. Cintron, are you currently</p> <p>9 treating with any doctors or therapists for the</p> <p>10 PTSD?</p> <p>11 A. Yes. I just switched to a new</p> <p>12 doctor. Russell Medical Group in Georgia. And</p> <p>13 they are treating me for my PTSD, anxiety, and</p> <p>14 related, you know, medical issues.</p> <p>15 Q. Prior to Russell Medical Group -- do</p> <p>16 you know approximately when you started treating</p> <p>17 with that entity?</p> <p>18 A. A few months ago. I believe, like,</p> <p>19 three or four months ago, I switched.</p> <p>20 Q. And was there -- let me back up.</p> <p>21 Apart from Russell Medical Group, is there</p> <p>22 anyone else that you're currently treating with</p> <p>23 as it relates to your PTSD or anxiety?</p> <p>24 A. No, because everyone that I was</p> <p>25 treating with prior to going to this new doctor</p>	<p style="text-align: right;">Page 21</p> <p>1 E. CINTRON</p> <p>2 Ms. Whitley, I believe her name is, and I saw</p> <p>3 the nurse practitioner, Aurn. I believe it's</p> <p>4 A-U-R-N.</p> <p>5 Q. Apart -- so let me kind of back up.</p> <p>6 I want to be clear in the questions I'm asking</p> <p>7 you.</p> <p>8 Holmesburg Medical, you said that was the</p> <p>9 entity that first diagnosed you with the PTSD</p> <p>10 and the anxiety?</p> <p>11 A. No. They didn't diagnose me. He</p> <p>12 referred me based on my medical conditions.</p> <p>13 Q. And so Dr. Carter referred you to</p> <p>14 Philmont Guidance, and is that the entity that</p> <p>15 diagnosed your condition?</p> <p>16 A. Yes.</p> <p>17 Q. Did you -- is there anyone else</p> <p>18 besides Philmont Guidance that has provided</p> <p>19 treatment for those conditions?</p> <p>20 A. When I went to Georgia, I started</p> <p>21 seeing Dr. Remalia, and he was my primary care.</p> <p>22 And he just continued my medical treatment in</p> <p>23 terms of my PTSD and medication management.</p> <p>24 Q. And do you know, is Dr. Remalia</p> <p>25 associated with a practice with the name of an</p>

<p style="text-align: right;">Page 22</p> <p>1 E. CINTRON</p> <p>2 entity?</p> <p>3 A. I believe it's Remalia Medical</p> <p>4 Group, or Highlands -- Highlands Medical Group.</p> <p>5 That's what it's called.</p> <p>6 Q. So Holmesburg Medical, Philmont</p> <p>7 Guidance, Dr. Remalia. Are there any other</p> <p>8 providers with whom you treated to seek care for</p> <p>9 your anxiety or depression?</p> <p>10 A. And recently my new doctor.</p> <p>11 Q. The --</p> <p>12 A. At Russell Medical.</p> <p>13 Q. Right.</p> <p>14 Can you tell me the -- when you were --</p> <p>15 let me back up. I'm sorry.</p> <p>16 Apart from the anxiety and the depression,</p> <p>17 are there any other conditions that currently</p> <p>18 prevent you from working?</p> <p>19 Oh, I'm sorry. I was wrong. I said</p> <p>20 "anxiety and depression." So it's anxiety and</p> <p>21 PTSD, correct? Is there any other conditions</p> <p>22 that prevent from you working?</p> <p>23 A. Severe depression, anxiety, PTSD.</p> <p>24 And I was recently diagnosed with having two</p> <p>25 small tumors, one in my pituitary, and one</p>	<p style="text-align: right;">Page 24</p> <p>1 E. CINTRON</p> <p>2 Q. So it's the thyroid medication and</p> <p>3 then paroxetan [sic]?</p> <p>4 A. Paroxetan, I believe, or paroxetine,</p> <p>5 or something like that.</p> <p>6 Q. I'll Google --</p> <p>7 A. I don't know the correct --</p> <p>8 Q. I'll Google it later.</p> <p>9 And then the trazodone, something like</p> <p>10 that, for insomnia?</p> <p>11 A. Yeah. To help me sleep at night.</p> <p>12 Q. So the -- so just so I can back up</p> <p>13 then, so you left the position with Sephora in</p> <p>14 light of your medical conditions, correct?</p> <p>15 A. Yes. Because I wasn't getting a lot</p> <p>16 of sleep at night, and just not able to</p> <p>17 function.</p> <p>18 Q. Did any of the doctors that you are</p> <p>19 treating with, or any of the entities we have</p> <p>20 talked about, have they provided you any records</p> <p>21 that state that you should take time off, or you</p> <p>22 can't work, anything like that, to apply --</p> <p>23 well, sorry, I don't want to be compound.</p> <p>24 Did they give you any documentation saying</p> <p>25 that you could not work?</p>
<p style="text-align: right;">Page 23</p> <p>1 E. CINTRON</p> <p>2 behind my left eye, which were causing me</p> <p>3 headaches.</p> <p>4 Q. And so is -- Russell Medical Group,</p> <p>5 are they the only entity treating you currently</p> <p>6 for the anxiety, depression, and PTSD?</p> <p>7 A. Yes. And I'm supposed to be</p> <p>8 scheduling, and since I just started with them,</p> <p>9 I'm supposed to be scheduling to see a</p> <p>10 psychiatrist and continue my counseling, but it</p> <p>11 hasn't been set up yet.</p> <p>12 Q. And forgive me, I just want to make</p> <p>13 sure I'm clear. Apart from Holmesburg -- I'm</p> <p>14 sorry, Russell Medical Group, are there any</p> <p>15 other -- any other counselors or psychiatrists</p> <p>16 besides Philmont Guidance or Dr. Remalia that</p> <p>17 you have sought treatment with?</p> <p>18 A. No.</p> <p>19 Q. And are you -- can you identify the</p> <p>20 medications that you're currently taking for the</p> <p>21 conditions that you have?</p> <p>22 A. I am taking paroxetine for my PTSD.</p> <p>23 I am taking trazodone for insomnia. And I just</p> <p>24 take my regular medication for my thyroid. I</p> <p>25 can't remember the name of it.</p>	<p style="text-align: right;">Page 25</p> <p>1 E. CINTRON</p> <p>2 A. I don't know what Ms. -- the nurse</p> <p>3 practitioner from Philmont Guidance put in her</p> <p>4 records, but she recommended that I do not</p> <p>5 return back to work to the Philadelphia Police</p> <p>6 Department, and take a medical leave of absence.</p> <p>7 Q. And do you know -- do you know</p> <p>8 approximately when that note was provided?</p> <p>9 A. That was in 2017, I believe it was,</p> <p>10 2017, '18.</p> <p>11 Q. Have you -- in light of your</p> <p>12 inability to work, have you applied for any kind</p> <p>13 of Social Security Disability or other</p> <p>14 disability payments?</p> <p>15 A. I just recently applied for Medicare</p> <p>16 to get medical because I know my medical is</p> <p>17 about to expire, but I have not gotten an answer</p> <p>18 yet.</p> <p>19 Q. And so -- but apart from the</p> <p>20 Medicare application, have you applied for any</p> <p>21 form of disability payments or income</p> <p>22 replacement?</p> <p>23 A. No.</p> <p>24 Q. Prior to working at Off Duty, you</p> <p>25 were employed with the City of Philadelphia; is</p>

<p style="text-align: right;">Page 26</p> <p>1 E. CINTRON</p> <p>2 that correct?</p> <p>3 A. Yes.</p> <p>4 Q. And can you tell me -- I know you</p> <p>5 held several positions, and we will work through</p> <p>6 that. Can you tell me when you started working</p> <p>7 with the City of Philadelphia?</p> <p>8 A. I began working for the City</p> <p>9 of Philadelphia in 1999, going into 2000.</p> <p>10 Q. And what was the title that you held</p> <p>11 at that time, if you remember?</p> <p>12 A. I worked for the City</p> <p>13 of Philadelphia prison system. And I was a</p> <p>14 correctional officer.</p> <p>15 Q. And what is the position you held</p> <p>16 next?</p> <p>17 A. I then moved -- after working there</p> <p>18 for seven years, I became a Philadelphia police</p> <p>19 officer.</p> <p>20 Q. And did you have -- and forgive me,</p> <p>21 I'm not versed in this -- what was -- did you</p> <p>22 have a rank when you became a police officer?</p> <p>23 A. Initially, I was a police officer.</p> <p>24 I then took the corporal's exam and became a</p> <p>25 corporal. I then took the sergeant's exam and</p>	<p style="text-align: right;">Page 28</p> <p>1 E. CINTRON</p> <p>2 did you report to a corporal? I guess let me</p> <p>3 ask the question this way. I would like to find</p> <p>4 out the reporting structure as you moved up.</p> <p>5 And you may say, I reported to several</p> <p>6 supervisors, but I would just -- for simplicity</p> <p>7 sake, could you tell me, as a police officer, I</p> <p>8 reported to a corporal -- or did you have a</p> <p>9 designated supervisor?</p> <p>10 So with that long-winded exposition [sic]</p> <p>11 out of the way, can you tell me, as a police</p> <p>12 officer, who did you report to?</p> <p>13 A. As a police officer on patrol, you</p> <p>14 report to your first-line supervisor, which is a</p> <p>15 sergeant. However, the corporal is an</p> <p>16 administrative position, so if they give you an</p> <p>17 assignment, you also are supposed to follow</p> <p>18 their orders, because they are a higher rank.</p> <p>19 Q. So there is a chain of command in</p> <p>20 the police force, correct?</p> <p>21 A. Yes.</p> <p>22 Q. All right. In the role as a police</p> <p>23 officer -- withdraw that.</p> <p>24 When you -- when you were elevated into</p> <p>25 the role of a corporal, what was the chain of</p>
<p style="text-align: right;">Page 27</p> <p>1 E. CINTRON</p> <p>2 became a sergeant. I then took the lieutenant's</p> <p>3 exam and became a lieutenant.</p> <p>4 Q. So how long -- approximately. Don't</p> <p>5 worry if you -- this is -- one of the ground</p> <p>6 rules I skipped in the beginning is, this isn't</p> <p>7 a memory test, so I said, you know, only tell me</p> <p>8 what you know, but if I'm asking for things</p> <p>9 going back, if you don't remember, that's quite</p> <p>10 all right.</p> <p>11 Do you know how long approximately you</p> <p>12 held the title of police officer?</p> <p>13 A. I believe it was like, six, seven</p> <p>14 years.</p> <p>15 Q. And do you know how long you held</p> <p>16 the title of corporal?</p> <p>17 A. Four years.</p> <p>18 Q. How long did you hold the title of</p> <p>19 sergeant?</p> <p>20 A. Three years.</p> <p>21 Q. And title of lieutenant?</p> <p>22 A. For the remainder.</p> <p>23 Q. Who -- let me ask this in an easier</p> <p>24 way because there might be multiple names. As a</p> <p>25 police officer, you -- did you have a certain --</p>	<p style="text-align: right;">Page 29</p> <p>1 E. CINTRON</p> <p>2 command there? Who did you report to?</p> <p>3 A. A lieutenant.</p> <p>4 Q. And when you became a sergeant, who</p> <p>5 were you reporting to?</p> <p>6 A. The lieutenant. That's what you</p> <p>7 just asked me?</p> <p>8 Q. No. When you were the -- as -- when</p> <p>9 you were in the corporal role, who was your --</p> <p>10 who did you report to?</p> <p>11 A. I reported to a sergeant. And</p> <p>12 sometimes the corporal.</p> <p>13 Q. And then when you were then promoted</p> <p>14 to lieutenant, who did you report to?</p> <p>15 A. Can you rephrase that? Because</p> <p>16 you're confusing me.</p> <p>17 Q. Sorry. So let me back up. Let's</p> <p>18 make sure. I'm going to kind of go back over</p> <p>19 what I think you and I both just explained, and</p> <p>20 that way we can both make sure we are on the</p> <p>21 same page.</p> <p>22 When you were a police officer, your --</p> <p>23 you were -- you were reporting to a sergeant?</p> <p>24 A. First-line supervisor, which is a</p> <p>25 sergeant.</p>

<p style="text-align: right;">Page 30</p> <p>1 E. CINTRON</p> <p>2 Q. Okay. When you were elevated into a</p> <p>3 corporal, you were then reporting to the</p> <p>4 sergeant, correct? That was your first-line</p> <p>5 supervisor?</p> <p>6 A. No. I was reporting to the</p> <p>7 lieutenant.</p> <p>8 Q. And when you were elevated then into</p> <p>9 the sergeant role, were you still reporting to</p> <p>10 the lieutenant?</p> <p>11 A. Yes.</p> <p>12 Q. All right. Then when you were</p> <p>13 elevated to the lieutenant, are you reporting to</p> <p>14 the deputy commissioner?</p> <p>15 A. When I was assigned to the district,</p> <p>16 I reported to the captain. When I got appointed</p> <p>17 to the position of the commanding officer of</p> <p>18 PAL, I reported to the deputy commissioner.</p> <p>19 Q. And when you say "PAL," just for the</p> <p>20 purposes of the record, you're referring to the</p> <p>21 Police Athletic League, correct?</p> <p>22 A. Yes. But, in addition to that, when</p> <p>23 I was appointed by Commissioner Ross to become</p> <p>24 the commander of the Police Athletic League, he</p> <p>25 told me that I reported to him, but to go to the</p>	<p style="text-align: right;">Page 32</p> <p>1 E. CINTRON</p> <p>2 right now, my questions all relate to this</p> <p>3 district position.</p> <p>4 When you would get -- do you get paper</p> <p>5 checks or do you get direct deposit?</p> <p>6 A. Both. Either.</p> <p>7 Q. And those paychecks, would they come</p> <p>8 from -- would it say the City of Philadelphia or</p> <p>9 the Philadelphia Police Department? What would</p> <p>10 that say?</p> <p>11 A. City of Philadelphia.</p> <p>12 Q. And when you were in that role as</p> <p>13 the -- for the district, did you have a</p> <p>14 designated shift? I think traditionally there</p> <p>15 are three shifts; is that correct?</p> <p>16 A. Yes.</p> <p>17 Q. And did you have a designated shift?</p> <p>18 A. I worked Monday through Friday, 9 to</p> <p>19 5, and I worked some afternoon initiatives from</p> <p>20 time to time. And sometimes the captain would</p> <p>21 switch my schedule as needed.</p> <p>22 Q. And just so -- was it Cram you said</p> <p>23 was the captain?</p> <p>24 A. Yes.</p> <p>25 Q. And was it Captain Cram then that</p>
<p style="text-align: right;">Page 31</p> <p>1 E. CINTRON</p> <p>2 deputy commissioner for the day-to-day things,</p> <p>3 you know, things that he doesn't need to be</p> <p>4 bothered with.</p> <p>5 Q. So what I would like to do,</p> <p>6 Ms. Cintron, is just -- if I heard you</p> <p>7 correctly, when you were elevated into the</p> <p>8 lieutenant role, you essentially held two roles;</p> <p>9 the first was when you were appointed, you said,</p> <p>10 to the district?</p> <p>11 A. Yes.</p> <p>12 Q. Can you briefly describe what that</p> <p>13 position entailed?</p> <p>14 A. So when I first got promoted to</p> <p>15 lieutenant, they assigned me to the 25th Police</p> <p>16 District. I was reporting to Captain Cram. And</p> <p>17 he selected me as the administrative lieutenant,</p> <p>18 as well as being in charge of the five squad</p> <p>19 officers, which consisted of narcotics team,</p> <p>20 technical team, the administrative staff in the</p> <p>21 operations room. I also worked on the streets</p> <p>22 when needed. So I just held a lot of different</p> <p>23 hats.</p> <p>24 Q. In the role as lieutenant -- and so</p> <p>25 what I want to do, just so we're clear, focusing</p>	<p style="text-align: right;">Page 33</p> <p>1 E. CINTRON</p> <p>2 set your schedule?</p> <p>3 A. Yes.</p> <p>4 Q. And -- and was there anyone besides</p> <p>5 Captain Cram that you reported to?</p> <p>6 A. No.</p> <p>7 Q. In your recollection, who was</p> <p>8 responsible for elevating you into the</p> <p>9 commanding officer of the PAL unit?</p> <p>10 A. Commissioner Richard Ross.</p> <p>11 Q. Did you have any conversations with</p> <p>12 Commissioner Ross about your elevation to the</p> <p>13 commanding officer of PAL?</p> <p>14 A. Well, initially, I received a call</p> <p>15 from his sergeant who informed me that</p> <p>16 Commissioner Ross has selected me for the</p> <p>17 position of the commanding officer of the</p> <p>18 Philadelphia Police Athletic League.</p> <p>19 Q. Do you remember the name of that</p> <p>20 sergeant?</p> <p>21 A. I can't recall his name.</p> <p>22 Q. And is it fair to say that you</p> <p>23 were -- you assumed the role of commanding</p> <p>24 officer for PAL in or around June of 2016?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 34</p> <p>1 E. CINTRON</p> <p>2 Q. Do you know when the phone call with</p> <p>3 this sergeant occurred?</p> <p>4 A. About a week prior to being</p> <p>5 reassigned to the Police Athletic League. He</p> <p>6 told me to expect a call from Commissioner Ross</p> <p>7 with further instructions that afternoon.</p> <p>8 Q. Did you submit any application for</p> <p>9 that role?</p> <p>10 A. No.</p> <p>11 Q. Did you have any role in making an</p> <p>12 interest in that role known?</p> <p>13 A. No.</p> <p>14 Q. So it was something that</p> <p>15 Commissioner Ross decided on his own?</p> <p>16 A. He decided it based on his</p> <p>17 recommendations from other deputies and other</p> <p>18 supervisors that he spoke to. And when he</p> <p>19 called me to give me further instructions about</p> <p>20 my role as a commanding officer, he explained</p> <p>21 that he had heard many great things about me and</p> <p>22 my leadership ability and my ability to work</p> <p>23 with the officers, and that's why he had</p> <p>24 selected me for the role.</p> <p>25 Q. Did he -- did he identify any of the</p>	<p style="text-align: right;">Page 36</p> <p>1 E. CINTRON</p> <p>2 Qualli, Maureen Rush, and a few other board</p> <p>3 members. I can't recall the names, but it was</p> <p>4 at least 15 people in that room. And they all</p> <p>5 began to ask me questions.</p> <p>6 Q. Do you recall where that meeting</p> <p>7 occurred?</p> <p>8 A. Downtown, down here somewhere. But</p> <p>9 I can't recall. I believe it was like 17th and</p> <p>10 Market.</p> <p>11 Q. And can you tell me -- you mentioned</p> <p>12 that you were asked some questions. Can you</p> <p>13 tell me what, if anything specifically, you</p> <p>14 remember you were asked during that meeting?</p> <p>15 A. They asked me about my background in</p> <p>16 terms of my positions, just like you -- you</p> <p>17 asked. And they asked me about my community</p> <p>18 involvement. They asked me what would I bring</p> <p>19 to PAL. But, specifically, they were asking me</p> <p>20 how I would handle disciplinary issues with the</p> <p>21 police officers.</p> <p>22 Q. And so as -- if I understand that</p> <p>23 correctly, those police officers, they would</p> <p>24 report to you as the commanding officer?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 35</p> <p>1 E. CINTRON</p> <p>2 deputies or supervisors on whom he was relying?</p> <p>3 A. Yes. It was Deputy Commissioner</p> <p>4 Coulter and the other female deputy commissioner</p> <p>5 who I had met at community events.</p> <p>6 Q. Do you recall that individual's</p> <p>7 name?</p> <p>8 A. I can't recall her name.</p> <p>9 Q. Apart from Commissioner Ross, do you</p> <p>10 know if anyone else was involved in the decision</p> <p>11 to appoint you as the commanding officer of PAL?</p> <p>12 A. No.</p> <p>13 Q. So, from your understanding, he was</p> <p>14 the only person who made that decision?</p> <p>15 A. Yes and no. If I could explain</p> <p>16 that.</p> <p>17 Q. Sure. Go ahead.</p> <p>18 A. Commissioner Ross had me do an</p> <p>19 informal interview with the PAL board. He</p> <p>20 stated that it was his decision, but that</p> <p>21 because we were working in a collaborative</p> <p>22 effort with the PAL board, that I needed to meet</p> <p>23 with the PAL board to do an informal interview.</p> <p>24 When I arrived to this meeting, at the</p> <p>25 meeting was Bernie Prazenica, Ron Rabena, Ted</p>	<p style="text-align: right;">Page 37</p> <p>1 E. CINTRON</p> <p>2 Q. Do you recall when that meeting</p> <p>3 occurred?</p> <p>4 A. It was the same week that I was</p> <p>5 assigned to PAL, because it all happened fairly</p> <p>6 quickly. I think I received the call from the</p> <p>7 sergeant on a Wednesday. And that same</p> <p>8 Wednesday I spoke to Commissioner Ross. I went</p> <p>9 to meet with the board the next day. And then</p> <p>10 on Friday, I received another call from the</p> <p>11 commissioner's office, informing me that I</p> <p>12 report -- that I would report to PAL that</p> <p>13 Monday.</p> <p>14 Q. Did anyone from PAL, those -- the</p> <p>15 individual -- well, let me back up.</p> <p>16 Did any of the individuals on the board</p> <p>17 there that day ever tell you that they had</p> <p>18 approved your appointment as the commanding</p> <p>19 officer?</p> <p>20 A. They explained that -- they were</p> <p>21 saying -- was that their approval was necessary</p> <p>22 for me to be on PAL. They did explain that,</p> <p>23 ultimately, it was Commissioner Ross's decision,</p> <p>24 but that because we work collaboratively, that</p> <p>25 they had a say in who goes to PAL.</p>

<p style="text-align: right;">Page 38</p> <p>1 E. CINTRON</p> <p>2 Q. After you were appointed -- so you</p> <p>3 were told that Friday, beginning Monday you're</p> <p>4 going to be -- you'll be acting as the</p> <p>5 commanding officer of PAL; is that correct?</p> <p>6 A. Yes.</p> <p>7 Q. After you were -- after that change,</p> <p>8 did you continue to receive pay from the City</p> <p>9 of Philadelphia?</p> <p>10 A. Yes. The collaboration involves the</p> <p>11 police department covering the pay for all</p> <p>12 officers assigned to PAL.</p> <p>13 Q. So just so I understand you</p> <p>14 correctly, the paycheck you received, even</p> <p>15 though you were working as the commanding</p> <p>16 officer, still came from the City of</p> <p>17 Philadelphia, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Did you receive any paychecks or</p> <p>20 income directly from PAL?</p> <p>21 A. No.</p> <p>22 Q. When you were serving in the</p> <p>23 commanding officer role, did you continue to</p> <p>24 receive your benefits through the city?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 40</p> <p>1 E. CINTRON</p> <p>2 correctly.</p> <p>3 After you became -- is it -- Ms. Cintron,</p> <p>4 forgive me, because I'll try to make us move a</p> <p>5 little quicker. If I say, going forward,</p> <p>6 "commanding officer," as it relates to your</p> <p>7 title or your role, is it fair for -- what I</p> <p>8 would like to do is say -- if I refer to your</p> <p>9 position as commanding officer, I intend that to</p> <p>10 mean the commanding officer of the PAL unit. Is</p> <p>11 that okay with you? That way I don't have to</p> <p>12 say every time, "as the commanding officer of</p> <p>13 the PAL unit," if I just say -- so is it</p> <p>14 acceptable to you for me to simply say, "as the</p> <p>15 commanding officer," will you understand that I</p> <p>16 mean, as the PAL unit?</p> <p>17 A. Yes.</p> <p>18 Q. Thank you.</p> <p>19 You -- in the role of the commanding</p> <p>20 officer, you said that you would report to both</p> <p>21 Commissioner Ross, and then for the deputy</p> <p>22 commissioner for day-to-day activities; is that</p> <p>23 correct?</p> <p>24 A. That -- those were the instructions</p> <p>25 that Commissioner Ross gave me when he assigned</p>
<p style="text-align: right;">Page 39</p> <p>1 E. CINTRON</p> <p>2 Q. Did PAL pay for any of your</p> <p>3 benefits?</p> <p>4 A. No.</p> <p>5 Q. Did PAL ever pay you any bonuses?</p> <p>6 A. No.</p> <p>7 Q. But if I understood you correctly</p> <p>8 then, also the officers who were assigned to the</p> <p>9 PAL unit, they were also -- they were also paid</p> <p>10 by the city; is that correct?</p> <p>11 A. Yes. But there was an incident</p> <p>12 where PAL was paying the officers \$25 to cover</p> <p>13 some city events, which became an issue, because</p> <p>14 I informed them that the officers have to get</p> <p>15 paid through the city.</p> <p>16 Q. And why is it they have to be paid</p> <p>17 through the city?</p> <p>18 A. Because they are considered</p> <p>19 employees of the City of Philadelphia, and they</p> <p>20 have to get paid their -- at the rate that they</p> <p>21 are supposed to get paid.</p> <p>22 Q. Pursuant to their rank?</p> <p>23 A. Yes.</p> <p>24 Q. I'd like to back up and make sure I</p> <p>25 understood something you had said earlier,</p>	<p style="text-align: right;">Page 41</p> <p>1 E. CINTRON</p> <p>2 me to PAL.</p> <p>3 Q. And who was the -- at the time, who</p> <p>4 was the Deputy Commissioner to whom you would</p> <p>5 report?</p> <p>6 A. Deputy Commissioner Myron Patterson.</p> <p>7 Q. And Deputy Commissioner Patterson is</p> <p>8 a police officer?</p> <p>9 A. He was the first deputy right under</p> <p>10 Ross.</p> <p>11 Q. And so, forgive me, but even though</p> <p>12 he's the deputy commissioner, he's technically</p> <p>13 still a police officer, correct?</p> <p>14 A. Yes.</p> <p>15 Q. And so he's an employee of the city?</p> <p>16 A. Yes.</p> <p>17 Q. And Commissioner Ross is also an</p> <p>18 employee of the city?</p> <p>19 A. Yes.</p> <p>20 Q. When you took over as the commanding</p> <p>21 officer, did you have a set shift or schedule</p> <p>22 that you adhered to?</p> <p>23 A. It's difficult to have a set</p> <p>24 schedule at PAL because, even though my hours</p> <p>25 were from eight to four, a lot of the events</p>

<p style="text-align: right;">Page 42</p> <p>1 E. CINTRON</p> <p>2 happened after-hours or on weekends. So, even</p> <p>3 though I was getting paid work eight to four, I</p> <p>4 was not getting paid to work those extra hours.</p> <p>5 Q. So that --</p> <p>6 A. Most times.</p> <p>7 Q. Were there times you were paid for</p> <p>8 those events?</p> <p>9 A. There was a few events that I</p> <p>10 submitted overtime requests, and it was granted</p> <p>11 by Deputy Commissioner Patterson.</p> <p>12 Q. And was that overtime paid by the</p> <p>13 city?</p> <p>14 A. Yes.</p> <p>15 Q. Apart from Commissioner Ross and</p> <p>16 Deputy Commissioner Patterson, was there anyone</p> <p>17 else that you were reporting to at that time?</p> <p>18 A. Yes. In terms of receiving my</p> <p>19 orders, I would receive my orders from the</p> <p>20 Deputy Commissioner and Commissioner Patterson</p> <p>21 and Commissioner Ross. But I worked jointly --</p> <p>22 I was supposed to work jointly with Ted Qualli</p> <p>23 and the board to obtain the resources and --</p> <p>24 that we needed for PAL, and develop programs for</p> <p>25 the kids at the PAL centers, and basically run</p>	<p style="text-align: right;">Page 44</p> <p>1 E. CINTRON</p> <p>2 MR. GOLDEN: We'll do PAL-2, Ike?</p> <p>3 MR. GREEN: Sounds good.</p> <p>4 MR. GOLDEN: Just this is a --</p> <p>5 I'm going to give it --</p> <p>6 Ms. Cintron I'm going to have</p> <p>7 this labeled PAL-2. You don't need</p> <p>8 to go through the whole thing. If</p> <p>9 you would like to, we can go off the</p> <p>10 record and you agree to do that, but</p> <p>11 what I would like to do is I'm just</p> <p>12 going to ask you some specific</p> <p>13 questions about this, and we can</p> <p>14 work our way through it. But if you</p> <p>15 would like, we can take a short</p> <p>16 break and you can read it. Do you</p> <p>17 mind how we handle that?</p> <p>18 THE WITNESS: I would rather read</p> <p>19 it.</p> <p>20 MR. GOLDEN: Okay.</p> <p>21 THE WITNESS: And take -- you</p> <p>22 know, take a break to read it.</p> <p>23 MR. GOLDEN: All right. We will</p> <p>24 take -- we'll go off the record.</p> <p>25 THE VIDEOGRAPHER: The time is</p>
<p style="text-align: right;">Page 43</p> <p>1 E. CINTRON</p> <p>2 the day-to-day operations of the PAL as a whole.</p> <p>3 Q. So when you say that -- and I'll</p> <p>4 come back to Ted and the board in a moment, but</p> <p>5 you said that the orders would come from Deputy</p> <p>6 Commissioner Patterson or Commissioner Ross, is</p> <p>7 that right that they were -- you would report up</p> <p>8 to them in the chain of command?</p> <p>9 A. Yes. In the structure of the chain</p> <p>10 of command, I would report to them. But a lot</p> <p>11 of my instructions came from the board in terms</p> <p>12 of PAL matters.</p> <p>13 Q. Can you tell me what instructions</p> <p>14 came to you from the board?</p> <p>15 A. The board would plan events,</p> <p>16 programming, initiatives, community events. And</p> <p>17 they would direct what they wanted to be done</p> <p>18 for us to implement.</p> <p>19 Q. And when you say "for us to</p> <p>20 implement," do you mean the police officers, the</p> <p>21 civilian employees, or both?</p> <p>22 A. Everyone. Everyone involved in any</p> <p>23 of those events or community initiatives.</p> <p>24 Q. Just -- let me back up.</p> <p>25 PAL is a -- it's an -- let me do this.</p>	<p style="text-align: right;">Page 45</p> <p>1 E. CINTRON</p> <p>2 11:52. We are off the record.</p> <p>3 (First Amended Complaint is</p> <p>4 received and marked as Exhibit PAL-2</p> <p>5 for identification, as of this</p> <p>6 date.)</p> <p>7 (A break was taken.)</p> <p>8 THE VIDEOGRAPHER: The time is</p> <p>9 12:09. We are now on the record.</p> <p>10 MR. GREEN: Excuse me, what was</p> <p>11 the last question that was asked,</p> <p>12 and the answer?</p> <p>13 MR. GOLDEN: Well, I was asking</p> <p>14 about -- I was going to ask</p> <p>15 questions about PAL.</p> <p>16 MR. GREEN: Okay.</p> <p>17 Q. Ms. Cintron, in the document we've</p> <p>18 labeled as PAL-2, in paragraph 5 it talks about</p> <p>19 PAL being a nonprofit organization, and in</p> <p>20 paragraph 6, an independently organized</p> <p>21 nonprofit. So am I to understand it correctly,</p> <p>22 it is a -- PAL itself is a separate nonprofit</p> <p>23 organization that works with the city?</p> <p>24 A. Yes. The Philadelphia Police</p> <p>25 Athletic League began, as we know, 75 years</p>

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2 ago --

3 (Court reporter clarification.)

4 A. Philadelphia Police Department PAL

5 unit was established 75 years ago. And they

6 began to work in collaboration with PAL, the

7 nonprofit unit, to achieve the initiatives in

8 the community.

9 Q. So if I heard that correctly, there

10 is -- within the police department, there's a

11 unit that is assigned to PAL; is that correct?

12 A. PAL is a unit, and officers are

13 assigned to a unit, yes.

14 Q. And those officers that are assigned

15 to the unit, they work with the PAL nonprofit

16 organization, correct?

17 A. Yes.

18 Q. So what I want to do to be clear is,

19 there's a police unit on one hand, and then

20 there's the nonprofit organization on another.

21 I just want to -- for the purposes of my next

22 couple of questions, those are -- there are

23 two -- two entities, correct?

24 A. They are two entities working

25 together.

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2 Q. In terms of the PAL unit, you were

3 the commanding officer, correct?

4 A. Yes.

5 Q. And the -- approximately how many

6 police officers were assigned to the unit?

7 A. At the time I believe it was 27, two

8 sergeants.

9 Q. So that the 27 includes the two

10 sergeants?

11 A. No, I think it was 27 police

12 officers and two sergeants, approximately.

13 Q. And did the -- did the police

14 officers, in terms of their chain of command,

15 did they report to the sergeants?

16 A. Yes. It's still the same

17 chain-of-command structure.

18 Q. And then those sergeants would

19 report to you, correct?

20 A. Yes.

21 Q. Apart from the sergeants and the

22 police officers, did anyone else in the unit

23 report to you?

24 A. I would consult with the PAL staff

25 in reference to all matters.

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2 Q. And when you say "staff," is that --

3 do you mean to say the employees of the

4 nonprofit?

5 A. I'm referring to Ted Qualli, as the

6 director, and I were supposed to be working

7 together to manage everyone in the PAL unit.

8 Q. Ted --

9 A. With the exception that Ted Qualli,

10 by not being a sworn police officer or

11 supervisor, cannot dictate orders to the

12 officers. So anything that Ted required, he

13 would have to do it by letting the sergeant

14 know, or I know, so that we can let the officers

15 know what they need to do.

16 Q. Gotcha. So if Ted needed something

17 from one of the police officers, he would need

18 to either work through you or the sergeants to

19 have that order -- that they would need -- you

20 or those sergeants would need to give those

21 orders, correct?

22 A. If there was anything in reference

23 to an order, yes.

24 Q. And do you know -- do you know who

25 Ted reported to?

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2 A. Ted reported to the board. Board

3 chair Bernie Prazenica, and co-chair at the

4 time, Ron Rabena.

5 Q. And within -- to give you -- who

6 within PAL reported to Ted?

7 A. The way he had it structured,

8 everything went to Ted for approval.

9 Q. So, what I mean by that is if

10 there's a PAL -- for example, the name -- you

11 know the name Chase Trimmer; is that correct?

12 A. Yes.

13 Q. Did Mr. Trimmer report to Ted?

14 A. Ted was his supervisor, but he

15 worked with me on programs.

16 Q. So that was my question.

17 Mr. Trimmer would -- could work with you,

18 but he reported to Ted, correct?

19 A. Ted was his immediate supervisor,

20 yes.

21 Q. And Mr. Trimmer was a PAL employee;

22 is that correct?

23 A. Yes. But, in part, he would also

24 report to me in terms of working with me with

25 the programs and initiatives.

<p style="text-align: right;">Page 50</p> <p>1 E. CINTRON</p> <p>2 Q. For Ted, do you know who paid his</p> <p>3 salary?</p> <p>4 A. The Police Athletic League, the</p> <p>5 nonprofit.</p> <p>6 Q. And do you know, if you know, do you</p> <p>7 know who paid Mr. Trimmer's salary?</p> <p>8 A. The Police Athletic League, the</p> <p>9 nonprofit.</p> <p>10 Q. Did Mr. Qualli have the ability to</p> <p>11 discipline or reprimand any of your officers?</p> <p>12 A. He didn't have the ability to do so</p> <p>13 because of departmental policy, but he would</p> <p>14 bring the complaints to me, and I would</p> <p>15 discipline accordingly.</p> <p>16 Q. What is that, the policy you just</p> <p>17 mentioned? I'm sorry, I -- the discipline --</p> <p>18 A. Because Ted Qualli is not employed</p> <p>19 by the City of Philadelphia, he cannot impose</p> <p>20 the disciplinary process on police officers.</p> <p>21 Q. Did -- as the commanding officer,</p> <p>22 did you have the ability to discipline PAL</p> <p>23 employees?</p> <p>24 A. That would be done through Ted.</p> <p>25 Anything official would have gone through Ted.</p>	<p style="text-align: right;">Page 52</p> <p>1 E. CINTRON</p> <p>2 speak to someone in reference to an incident at</p> <p>3 PAL.</p> <p>4 Q. Is that the incident between</p> <p>5 Mr. Trimmer and Officer Clayman?</p> <p>6 A. No. I never disciplined Chase</p> <p>7 Trimmer.</p> <p>8 Q. Then the incident that you referred</p> <p>9 to, what was that incident where you went to</p> <p>10 Ted?</p> <p>11 A. I asked Ted to address a problem</p> <p>12 with one of his employees -- actually, several</p> <p>13 of the PAL employees at different times, and in</p> <p>14 reference to condescending remarks,</p> <p>15 inappropriate remarks. And Ted would laugh it</p> <p>16 off and would tell me that people can say what</p> <p>17 they want to say.</p> <p>18 Q. So these were --</p> <p>19 A. And he would never address any</p> <p>20 discipline issues with his staff, that I brought</p> <p>21 to his attention.</p> <p>22 Q. If Mr. Qualli did not do that, why</p> <p>23 would you not discipline them yourself?</p> <p>24 A. I would try to go through Ted out of</p> <p>25 respect that they reported to him. But when</p>
<p style="text-align: right;">Page 51</p> <p>1 E. CINTRON</p> <p>2 Q. So I think it's -- if I'm hearing</p> <p>3 you correctly, if Ted had a problem with a</p> <p>4 police officer, he did not have the authority to</p> <p>5 do anything. It had to go through you,</p> <p>6 correct?</p> <p>7 A. Yes.</p> <p>8 Q. And if you had a problem with one of</p> <p>9 his employees, it would have to go through Ted</p> <p>10 to take any kind of adverse action, correct?</p> <p>11 A. Not necessarily, because they also</p> <p>12 reported to me.</p> <p>13 Q. And so the --</p> <p>14 A. Under the structure, Ted and I were</p> <p>15 responsible for supervising everyone in the</p> <p>16 unit. The only exception was that because of</p> <p>17 sworn police personnel having contractual</p> <p>18 agreements and a union that had to be done</p> <p>19 through me, any official actions had to be done</p> <p>20 through me.</p> <p>21 Q. Do you recall any instances where,</p> <p>22 on your own, without Ted's involvement, you</p> <p>23 disciplined a PAL employee?</p> <p>24 A. I never disciplined anyone without</p> <p>25 Ted's knowledge. He knew that I was going to</p>	<p style="text-align: right;">Page 53</p> <p>1 E. CINTRON</p> <p>2 with no avail or remedial actions taken, I would</p> <p>3 have to address certain issues myself.</p> <p>4 Q. And did you ever have a situation</p> <p>5 where you addressed that situation with a</p> <p>6 specific PAL employee?</p> <p>7 A. What situation?</p> <p>8 Q. Well, you're saying if you</p> <p>9 reported -- if you tried to go through Ted, and</p> <p>10 no remedial action was taken, I'm asking, do you</p> <p>11 recall any instances where you yourself then</p> <p>12 took remedial action as it relates to that PAL</p> <p>13 employee?</p> <p>14 A. I didn't take official remedial</p> <p>15 action against any PAL employee. I spoke to PAL</p> <p>16 employees about different issues that were</p> <p>17 happening at the center -- I mean, at the -- at</p> <p>18 PAL.</p> <p>19 Q. Did Mr. Qualli have the ability to</p> <p>20 fire police officers?</p> <p>21 A. No.</p> <p>22 Q. Did you have the ability to fire PAL</p> <p>23 employees?</p> <p>24 A. No. Well, let me reframe that. I</p> <p>25 didn't have the authority to fire anyone. But</p>

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2 while Ted was executive director of PAL, he did

3 fire a multitude of PAL employees.

4 Q. And those were, like, PAL employees

5 that reported to him?

6 A. Yes.

7 Q. When you joined PAL, did you sign

8 any contract or agreement governing your

9 relationship with them?

10 A. No. We were -- I was told -- we

11 were told, when we were in the same, you know,

12 room, talking with the deputies, as well as PAL

13 staff and PAL board members, that Ted and I held

14 the same responsibilities as the top leadership.

15 And that we will work jointly to resolve all

16 matters involving PAL. But nothing was done

17 officially on paper.

18 Q. I'm sorry. One question I -- I'll

19 come back.

20 In your role as the commanding officer,

21 was there anyone within PAL, Ted or otherwise,

22 that had the ability to discipline you?

23 A. I would get reprimanded sometimes by

24 Ron Rabena or Prazenica based on either false

25 information that was told to them by Ted Qualli,

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2 or misleading information that they were being

3 told, without looking into my side of the story,

4 or what actually happened.

5 Q. So are there -- is there a specific

6 incident or incidents where Ron took adverse

7 action against you?

8 A. Yes.

9 Q. What do you -- can you identify

10 those incidents for me?

11 A. Okay. Well, Ron Rabena, the very

12 first day that I met Ron Rabena, he began to ask

13 me if I would do him a favor and have a young

14 man that was at the 17th District, a police

15 officer that was related to him -- at one time

16 he said related to him; another time he said it

17 was a friend's son, so I'm not quite sure what

18 was the relation -- the relationship there. And

19 he asked me to have this individual transferred

20 into the unit, wrote his name on a piece of

21 paper, and I told him there was a process to

22 having officers transferred into the unit, and

23 that I will look into it to see if this officer

24 had the qualifications to come to the Police

25 Athletic League -- to transfer into the Police

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2 Athletic League.

3 When I looked into the matter, the

4 individual had less than or approximately two

5 years on the job. He did not meet the

6 qualifications to transfer into PAL. He didn't

7 have the points required of a transfer into a

8 special unit, which is points that officers

9 accumulate based on their time on the job,

10 accommodations, work in the community, basically

11 experience, and sick-time usage, and whether or

12 not they had -- they were involved in any

13 disciplinary matters at that time.

14 And when I looked into it, this officer

15 didn't meet the qualifications. He didn't have

16 the points. He didn't have the time. He didn't

17 have the experience. So I relayed that

18 information back to Ron Rabena, who still

19 insisted that I transfer this officer to the

20 unit. Every time I saw Ron Rabena, he would

21 bring up the topic, and I had to reiterate to

22 him at least four or five times that I cannot

23 bring the officer to the unit, that my decision

24 to transfer officers into the unit was based on,

25 you know, whether or not they were on that

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2 transfer list and qualified to be transferred

3 into the unit.

4 After about the fourth or fifth

5 conversation, I then received a call from the

6 captain from the 17th District, who stated that

7 she was calling me because Ron Rabena asked her

8 to call me about the same young man that he

9 wanted transferred into the unit. And she began

10 to give me praises about the officer and why he

11 would be a good fit at PAL.

12 I explained to the captain that I would

13 not transfer the officer in because, one, he

14 didn't meet the qualifications. And I didn't

15 have the authority to transfer this officer in

16 or requesting for this officer to be transferred

17 in, based on that information I just gave you.

18 A week after that, I went to visit the

19 center, southwest PAL center. The officer was

20 working at the center. So I asked the officer,

21 like, what are you doing here? And the officer

22 stated that the captain from the 17th was

23 assigning him to PAL, even though he was

24 supposed to be working in the district.

25 At that point, I called the captain, and I

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2 told her that it's a liability to have an
3 officer working at PAL without being properly
4 checked out because we do like a child
5 background check, and he didn't have an official
6 transfer into the unit. And I was actually a
7 little upset because, you know, you don't -- you
8 don't do that to another commander, like, send
9 somebody to the unit without their permission or
10 knowledge.
11 And I then reported this incident to
12 Deputy Commissioner Patterson. And the officer
13 was instructed that he cannot work on the PAL
14 center until he meets the qualifications to come
15 to PAL, or he's transferred into the unit.
16 I then received a call from Darrell
17 Clarke, city council president, who literally
18 threatened me and told me that he was calling me
19 about a mutual acquaintance. He mentioned Ron
20 Rabena, and he began to talk to me about this
21 officer that Ron Rabena wanted transferred to
22 the unit.
23 At that point, I again explained to the
24 council president that -- the reasons why I
25 couldn't have this officer transferred into the

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2 unit, and explained to him that, you know, the
3 officer had to go through the process. And that
4 I would not violate departmental policy by what
5 we call parachuting an individual into a unit.
6 Which means, in the police department, that
7 you're basically bypassing the policy and the
8 rules to get someone into a unit, that's
9 considered a good unit to work in.
10 And at that point, the counsel president
11 told me, Well, I guess I'm going to have to make
12 a few calls about you, and, he says, starting
13 with your boss, Richard Ross.
14 I, at that point, told him that he could
15 call whoever he wants because I was -- I didn't
16 have the authority to do that. And I told him
17 that if you wanted to call Commissioner Ross,
18 then that was his discretion.
19 I took that as a threat, especially since
20 he mentioned, I'm going to call a few people
21 about you. And intimidating. They were
22 intimidating me into transferring this officer
23 into the unit. And, at that point, again I
24 reported this to the deputy.
25 Q. Do you recall when that phone call

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2 with Darrell Clarke occurred?
3 A. This happened in the few months that
4 I was at PAL. Like this was early on.
5 Q. And so, if I understood you
6 correctly, Ron wanted the officer transferred
7 into the PAL unit, correct?
8 A. Yes.
9 Q. And -- but in the end, the -- well,
10 was that officer ever transferred into the PAL
11 unit?
12 A. Yes, as soon as I left the unit.
13 Q. And so in terms of transferring
14 officers in and out of the unit, who had the
15 authority to do that?
16 A. I could only suggest or request
17 personnel based on who is on the transfer list
18 and qualified to come. The ultimate decision is
19 done by a superior officer. In this case, it
20 was Deputy Commissioner Sullivan. And the
21 reason I know this is because, when Deputy
22 Commissioner Sullivan got promoted to that
23 position, they called a meeting at Bernie
24 Prazenica's office, 6ABC, and Commissioner
25 Sullivan was present. And as soon as he walked

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2 into the room, he looked at me, went around,
3 shook everybody's hand except mine. He flagged
4 me literally with his hand, one of these
5 motions, and said to Bernie Prazenica, Don't
6 worry about her. In reference to the Memorandum
7 of Understanding, I'm going to make that go
8 away. And then he turned to Ron Rabena -- to
9 Ron Rabena -- And as far as that transfer of
10 that young man in the 17th District, don't worry
11 about that. I'm going to make it happen.
12 Q. Okay. And that conversation
13 happened when --
14 A. When we had a meeting at 6ABC in
15 Bernie Prazenica's office.
16 Q. And that's when Deputy Commissioner
17 took -- took over --
18 A. As soon as he came to PAL.
19 Q. Do you recall when that happened?
20 A. When he got promoted to deputy
21 commissioner, which was May of, I believe,
22 '17 -- I don't know. May 7th, I believe it was.
23 Q. But sometime in May 2017?
24 A. Yes.
25 Q. And then the officer was transferred

<p style="text-align: right;">Page 62</p> <p>1 E. CINTRON</p> <p>2 into the PAL unit after your employment ended?</p> <p>3 A. Well, by then, I went out on leave</p> <p>4 because of all of this stuff that was going on.</p> <p>5 And, eventually, that officer was transferred</p> <p>6 into the unit.</p> <p>7 Q. Do you know when the officer was</p> <p>8 transferred in?</p> <p>9 A. No. I just know that he's in the</p> <p>10 unit now.</p> <p>11 Q. Do you know if he had accumulated</p> <p>12 the points or the qualifications necessary to</p> <p>13 transfer in?</p> <p>14 A. No, I'm not aware. He was really</p> <p>15 far from having those qualifications because one</p> <p>16 is having five years on the job, and he only had</p> <p>17 two. So I do not think he had the</p> <p>18 qualifications.</p> <p>19 Q. So he had two years experience</p> <p>20 when -- in when, '16, when you joined?</p> <p>21 A. Yes.</p> <p>22 Q. Do you remember the officer's name?</p> <p>23 A. To be quite honest with you, it's</p> <p>24 probably written somewhere, but I can't remember</p> <p>25 off the top of my head.</p>	<p style="text-align: right;">Page 64</p> <p>1 E. CINTRON</p> <p>2 adverse action against you. You identified Ron</p> <p>3 and Bernie. And so when you said the adverse</p> <p>4 action, is it kind of the messaging that came</p> <p>5 from Ron?</p> <p>6 A. It was the interference that they</p> <p>7 would cause in my ability to do my job. It was</p> <p>8 the influence, their influence to have council</p> <p>9 president call me and threaten me. It was</p> <p>10 their -- the way they circumvented me, keeping</p> <p>11 me out of the loop on important matters, keeping</p> <p>12 me out of decision-making meetings, not sending</p> <p>13 me chain emails that I should have gotten so</p> <p>14 that I could do my job effectively so that they</p> <p>15 could go directly to the deputy -- Deputy</p> <p>16 Commissioner Sullivan to get the results that</p> <p>17 they wanted.</p> <p>18 Q. Let me back up and clarify. Deputy</p> <p>19 Commissioner Sullivan, when he -- sorry. When</p> <p>20 you were originally appointed as commanding</p> <p>21 officer of PAL, you were reporting to Deputy</p> <p>22 Commissioner Patterson, correct?</p> <p>23 A. Yes.</p> <p>24 Q. And that changed at some point, and</p> <p>25 you began reporting to Deputy Commissioner</p>
<p style="text-align: right;">Page 63</p> <p>1 E. CINTRON</p> <p>2 Q. So it was Ron Rabena who wanted the</p> <p>3 officer to, quote, parachute into the unit,</p> <p>4 correct?</p> <p>5 A. Yes.</p> <p>6 Q. But he did not have the authority to</p> <p>7 do that, correct?</p> <p>8 A. Right. Which is why he was going</p> <p>9 through all these means to intimidate me into</p> <p>10 having him transferred into the unit.</p> <p>11 Q. Because the decision to do that</p> <p>12 would go through you, correct?</p> <p>13 A. The decision to have him transferred</p> <p>14 in, no. I could only request based on who is on</p> <p>15 that list. And he wasn't on the list because he</p> <p>16 didn't qualify.</p> <p>17 Q. So there's a protocol within the</p> <p>18 police department that governs how officers come</p> <p>19 in and out of PAL?</p> <p>20 A. Yes. It's, I believe, Directive 12.</p> <p>21 Now, there is what we call parachuting, which is</p> <p>22 someone in the authority of commissioner can</p> <p>23 transfer someone in.</p> <p>24 Q. So that -- what I had asked was</p> <p>25 instances where anyone from PAL had taken</p>	<p style="text-align: right;">Page 65</p> <p>1 E. CINTRON</p> <p>2 Sullivan, correct?</p> <p>3 A. Yes. When Deputy Commissioner</p> <p>4 Sullivan got promoted to Deputy Commissioner, he</p> <p>5 went to Deputy Commissioner Patterson</p> <p>6 and requested to oversee the PAL unit, even</p> <p>7 though the PAL unit wasn't under the purview of</p> <p>8 deputy of operations.</p> <p>9 Q. So let's break that out. Is it</p> <p>10 deputy commissioner of operation, is that -- how</p> <p>11 many deputy commissioners are there?</p> <p>12 A. Well, at the time, there was --</p> <p>13 there's usually four. Four to seven, they</p> <p>14 handle different parts of running the</p> <p>15 department. You have a Deputy Commissioner of</p> <p>16 Patrol, Patrol and Operations, which that was</p> <p>17 Deputy Commissioner Sullivan's title. You have</p> <p>18 Deputy Commissioner of Organizational Services.</p> <p>19 There's, like, different titles. So PAL would</p> <p>20 have fallen under the Deputy Commissioner of</p> <p>21 Organizational Services, which was DC Patterson.</p> <p>22 But DC Sullivan volunteered to take over PAL.</p> <p>23 And I received a call from Deputy Commissioner</p> <p>24 Patterson, who told me that. He says -- he</p> <p>25 actually made a joke of it and said it's part of</p>

<p style="text-align: right;">Page 66</p> <p>1 E. CINTRON</p> <p>2 my command, but if he wants to take it over, it</p> <p>3 alleviates some work from my desk. And that's</p> <p>4 how DC Sullivan ended up being in control of</p> <p>5 PAL.</p> <p>6 Q. So was Deputy Commissioner Sullivan</p> <p>7 the Deputy Commissioner of Organizational</p> <p>8 Services?</p> <p>9 A. He was Patrol. So he would have</p> <p>10 been in charge of officers working districts,</p> <p>11 making arrests.</p> <p>12 Q. So do you know who is -- who is</p> <p>13 Deputy Commissioner Sullivan paid his salary by?</p> <p>14 A. City of Philadelphia.</p> <p>15 Q. Do you know, does PAL pay him any</p> <p>16 salary?</p> <p>17 A. I know that PAL supports his</p> <p>18 nonprofit organization.</p> <p>19 Q. Does PAL support other nonprofits?</p> <p>20 A. Yes, they do.</p> <p>21 Q. And so do they -- do you know, do</p> <p>22 they pay him -- apart from the nonprofits, do</p> <p>23 they pay him any salary?</p> <p>24 A. I don't know.</p> <p>25 Q. Any other actions by Ron where he</p>	<p style="text-align: right;">Page 68</p> <p>1 E. CINTRON</p> <p>2 We had a meeting in the commissioner's</p> <p>3 office where Ron Rabena attended, Bernie</p> <p>4 Prazenica, Ted Qualli, myself, Deputy</p> <p>5 Commissioner Patterson, and the commissioner's</p> <p>6 legal adviser. He's an attorney, Captain</p> <p>7 Hailey.</p> <p>8 At that meeting, I expressed my concerns</p> <p>9 about this policy. So did the commissioner.</p> <p>10 And the commissioner ordered Captain Hailey to</p> <p>11 draw up a memorandum of understanding to outline</p> <p>12 everyone's authority in this policy. And to</p> <p>13 solidify the relationship between PAL and the</p> <p>14 board, because the policy they were presenting</p> <p>15 didn't correctly represent that collaboration.</p> <p>16 At that point, Captain Hailey began to</p> <p>17 draw up this memorandum of understanding that</p> <p>18 the board, Bernie Prazenica, and Ron Rabena did</p> <p>19 not want for it to be implemented. They said</p> <p>20 that at the meeting; they said that after the</p> <p>21 meeting.</p> <p>22 And at that point, they were, like, really</p> <p>23 upset that this memorandum would have some checks</p> <p>24 and balances in place to make sure that there is no</p> <p>25 corruption, that there's no -- anything going on</p>
<p style="text-align: right;">Page 67</p> <p>1 E. CINTRON</p> <p>2 took adverse action against you?</p> <p>3 A. Just to circumventing me to go to</p> <p>4 the deputy, to make false complaints about me</p> <p>5 that were not accurate. And circumvent -- like</p> <p>6 basically circumventing my authority as the</p> <p>7 commanding officer of the Police Athletic</p> <p>8 League.</p> <p>9 Q. Can you give me any, like, examples,</p> <p>10 any specific examples of that?</p> <p>11 A. Yes. There was a situation where</p> <p>12 the -- as soon as I got to PAL, the very first</p> <p>13 week I got to PAL, Ted Qualli, Sunny Lee, and</p> <p>14 Pat Winter approached me with a policy that they</p> <p>15 wanted me to implement. In that policy, they</p> <p>16 changed the whole structure, whereas everything</p> <p>17 would go through final authority, and approval</p> <p>18 will go through Ted, and the board basically</p> <p>19 taking me out of the whole equation as the</p> <p>20 commanding officer.</p> <p>21 I didn't feel comfortable with signing</p> <p>22 that policy, so I took that policy to the police</p> <p>23 commissioner for his review. He agreed that I</p> <p>24 should not sign the policy, and called for a</p> <p>25 meeting.</p>	<p style="text-align: right;">Page 69</p> <p>1 E. CINTRON</p> <p>2 that could be misconstrued, you know, with the --</p> <p>3 in the community.</p> <p>4 So Captain Hailey began to draw up this</p> <p>5 document, and right before the document was</p> <p>6 supposed to be released, which was supposed to</p> <p>7 be in December of 2017, it was like the final</p> <p>8 draft for everybody to go over. And, obviously,</p> <p>9 they would have made different adjustments on</p> <p>10 both sides, but when it was announced that it</p> <p>11 was going to be discussed December of 2017, I</p> <p>12 received a call from -- actually, I got -- Ted</p> <p>13 Qualli came to my office to tell me that he had</p> <p>14 spoken to Maureen Rush, and Maureen Rush wanted</p> <p>15 to set up a meeting with me. And I asked Ted</p> <p>16 Qualli why she didn't call my phone, or why she</p> <p>17 didn't email me. He said, We were just having a</p> <p>18 conversation, and she brought it up.</p> <p>19 I said, Okay, no problem.</p> <p>20 He said, I believe she wants to talk about</p> <p>21 programs.</p> <p>22 I said, Okay, have her call me.</p> <p>23 When Maureen Rush called me, she</p> <p>24 specifically said that we were meeting about</p> <p>25 programs. She wanted to coordinate programs</p>

<p style="text-align: right;">Page 70</p> <p>1 E. CINTRON</p> <p>2 with the University of Penn and PAL, and she</p> <p>3 wanted to discuss these programs with me.</p> <p>4 So under false pretense, she calls me the</p> <p>5 day of the meeting, and she tells me, I don't</p> <p>6 want to meet at Penn, my office, and I don't</p> <p>7 want to meet at PAL, so can you meet me at a</p> <p>8 restaurant -- which was located underground,</p> <p>9 like in the basement of a hotel located near the</p> <p>10 University of Penn.</p> <p>11 When I met her there, excited to talk</p> <p>12 about programs, she told me, No, hold up right</p> <p>13 there. We are not going to talk about that</p> <p>14 right now because I want us to be both relaxed</p> <p>15 to talk about what I really brought you down</p> <p>16 here for.</p> <p>17 And at that point, I got a knot in my</p> <p>18 stomach, and I realized that it was a ploy to</p> <p>19 get me down there for something else, which was</p> <p>20 common for PAL and Ted Qualli to do.</p> <p>21 So we ate dinner. She began to say,</p> <p>22 You're really down here about the memorandum of</p> <p>23 understanding.</p> <p>24 And immediately I said, Who put you up to</p> <p>25 this? And she -- I said -- and I said, Was it</p>	<p style="text-align: right;">Page 72</p> <p>1 E. CINTRON</p> <p>2 her, like, Would you do this? Would you allow a</p> <p>3 man to run the show while you sit back and</p> <p>4 collect a check? And I said, Because I know I</p> <p>5 can't, because I have integrity, and I would not</p> <p>6 do that.</p> <p>7 And then she said, Well, I'm just letting</p> <p>8 you know, it's not going to go well for you. In</p> <p>9 the end you're going to lose. And, basically,</p> <p>10 that was the end of the conversation.</p> <p>11 She then offered to buy me dessert, and I</p> <p>12 told her no, and I got up and left.</p> <p>13 Q. What was the name of this</p> <p>14 restaurant?</p> <p>15 A. I can't recall, but it's University</p> <p>16 of Penn, by the University of Penn, and it's in</p> <p>17 the basement.</p> <p>18 Q. Is it in the University of</p> <p>19 Pennsylvania --</p> <p>20 A. If I drive by there, I'm pretty sure</p> <p>21 I can identify it, but I don't remember the name</p> <p>22 right now.</p> <p>23 Q. Maureen Rush is the -- is it the</p> <p>24 director of public safety for the University of</p> <p>25 Penn?</p>
<p style="text-align: right;">Page 71</p> <p>1 E. CINTRON</p> <p>2 Ted Qualli, Ron Rabena, and Prazenica?</p> <p>3 And she said, Yes. She said, Yeah, it was</p> <p>4 the good old boys. They wanted me to bring you</p> <p>5 down here and talk to you, woman to woman,</p> <p>6 that -- for you to let go of this issue about</p> <p>7 the MOU. Which she was talking about the</p> <p>8 memorandum of understanding.</p> <p>9 At that point, I told Maureen Rush that,</p> <p>10 you know, it was not right for them to get me to</p> <p>11 have this meeting with her under false pretense</p> <p>12 that we were going to talk about programs. And</p> <p>13 she said, Well, the guys wanted me to talk to</p> <p>14 you woman to woman, and so here we are.</p> <p>15 She then proceeded to tell me that I</p> <p>16 should let Ted Qualli run the show, and sit</p> <p>17 back, put my feet up, and collect the check.</p> <p>18 And she said, Just let the men handle everything</p> <p>19 at PAL because it's not going to go good for</p> <p>20 you, and this is not going to end well for you.</p> <p>21 And, at that point, you know, I posed the</p> <p>22 question to her, I said, as a woman, you know,</p> <p>23 it's hard to get women to leadership positions.</p> <p>24 And we have to work double as hard to get to</p> <p>25 positions that we want to achieve. And I told</p>	<p style="text-align: right;">Page 73</p> <p>1 E. CINTRON</p> <p>2 A. Yes. But she used to be a</p> <p>3 lieutenant for the Philadelphia Police</p> <p>4 Department before.</p> <p>5 Q. Do you know when she last was acting</p> <p>6 as a lieutenant for the city?</p> <p>7 A. No. I just know she's a board</p> <p>8 member, part of the executive board, part of the</p> <p>9 board.</p> <p>10 Q. When you had this meeting with her,</p> <p>11 was she -- was she then an employee of the city?</p> <p>12 A. No. She's the director of the</p> <p>13 University of Penn Police. And a board member</p> <p>14 of PAL.</p> <p>15 Q. Ms. Cintron, if you wouldn't mind,</p> <p>16 in what we've marked Number 2, that complaint,</p> <p>17 would you mind flipping to page 7. And if you</p> <p>18 look at paragraph 41, it says: Plaintiff met</p> <p>19 with Ms. Rush on October 24, 2016. Is that the</p> <p>20 meeting that you're referring to with Ms. Rush?</p> <p>21 A. It probably was, yes. To be honest</p> <p>22 with you, I can't remember the exact date. I</p> <p>23 believe that is the date because I remember it</p> <p>24 happened a few months before -- it happened</p> <p>25 right after they announced that the MOU would</p>

<p style="text-align: right;">Page 74</p> <p>1 E. CINTRON</p> <p>2 come out, after Bernie inquired about when the</p> <p>3 MOU would come out. And he was told that it</p> <p>4 would be finalized by December. And this</p> <p>5 happened a few months prior.</p> <p>6 Q. Okay. Just so we're clear --</p> <p>7 A. So, basically, Bernie Prazenica was</p> <p>8 informed that Captain Hailey was instructed to</p> <p>9 have it completed by December, and that they</p> <p>10 would give the final draft by December. Right</p> <p>11 after that is when Maureen Rush wanted to set up</p> <p>12 this meeting or set up the meeting.</p> <p>13 MR. GOLDEN: PAL-3.</p> <p>14 (Email 10/17/16 is received and</p> <p>15 marked as Exhibit PAL-3 for</p> <p>16 identification, as of this date.)</p> <p>17 Q. Ms. Cintron, you'll see that in the</p> <p>18 complaint in paragraph 38, it points out that in</p> <p>19 October of 2016, you received an email from</p> <p>20 Danielle Faust, the executive assistant to</p> <p>21 Ms. Rush, and then paragraph 40 says the email</p> <p>22 from Ms. -- from Faust was sent to schedule a</p> <p>23 convenient time for plaintiff to meet with</p> <p>24 Ms. Rush.</p> <p>25 Is it your understanding that this email</p>	<p style="text-align: right;">Page 76</p> <p>1 E. CINTRON</p> <p>2 Rush individually, so it happened around the</p> <p>3 same time.</p> <p>4 Q. So you -- if I heard that</p> <p>5 correctly --</p> <p>6 A. Maureen Rush had called me to set up</p> <p>7 the time when she told me that she didn't want</p> <p>8 to meet in the office, that she didn't want to</p> <p>9 meet at Penn.</p> <p>10 Q. And so if I heard you correctly,</p> <p>11 your meeting with Maureen happened. And then a</p> <p>12 week later the meeting with the DPS team</p> <p>13 occurred; is that correct?</p> <p>14 A. The other way around.</p> <p>15 Q. Okay. So --</p> <p>16 A. I met her -- we met as a team to</p> <p>17 discuss football events, the football</p> <p>18 championship. And I met with her after that,</p> <p>19 about the memorandum of understanding.</p> <p>20 Q. And was Ted Qualli in the meeting</p> <p>21 with her, with Maureen Rush, about the DPS?</p> <p>22 A. I don't think he went to that</p> <p>23 meeting. I can't recall.</p> <p>24 Q. Just so I can be clear in the</p> <p>25 sequencing of events, you have the DPS meeting</p>
<p style="text-align: right;">Page 75</p> <p>1 E. CINTRON</p> <p>2 on the front of page 3 is that email on</p> <p>3 October 17, 2016?</p> <p>4 A. Yes. But at the same time, we were</p> <p>5 also discussing about -- we were also discussing</p> <p>6 having a meeting where the whole team could meet</p> <p>7 about a football event. So it almost seems like</p> <p>8 it's the same chain of emails, if that makes</p> <p>9 sense. Because it was like we were trying to</p> <p>10 coordinate two separate meetings; one about the</p> <p>11 football, which was a meeting that we were going</p> <p>12 to meet to coordinate this football event with</p> <p>13 the entire team, that was going to be involved</p> <p>14 in carrying out duties for this event, and the</p> <p>15 meeting that she requested separately. That's</p> <p>16 why I'm not a hundred percent sure of the date.</p> <p>17 Q. Well, if you look at that email,</p> <p>18 PAL-3, from Danielle, it's addressed to -- says:</p> <p>19 Hello Evelyn, Following up with Maureen's</p> <p>20 request to find time for you to meet our DPS</p> <p>21 team.</p> <p>22 And then below that, the second bullet, is</p> <p>23 October 24 from 2:30 to 3:30. Do you see that?</p> <p>24 A. Yes. So we did meet -- the DPS met</p> <p>25 a week prior to this meeting that I had with</p>	<p style="text-align: right;">Page 77</p> <p>1 E. CINTRON</p> <p>2 with Maureen Rush, and then you have the meeting</p> <p>3 between yourself and only yourself with Maureen</p> <p>4 Rush, correct?</p> <p>5 A. Yes.</p> <p>6 Q. Is there anything else you remember</p> <p>7 being said in that meeting with Maureen Rush?</p> <p>8 A. What I stated.</p> <p>9 Q. So that's everything you recall</p> <p>10 about the meeting?</p> <p>11 A. Yes.</p> <p>12 Q. What I would like to do,</p> <p>13 Ms. Cintron, is I am -- earlier, I had asked you</p> <p>14 about any adverse action that had been taken</p> <p>15 against you by anybody at PAL. So let me ask a</p> <p>16 more specific question.</p> <p>17 Was there ever a time when you were the</p> <p>18 commanding officer, where anyone at PAL reduced</p> <p>19 your pay?</p> <p>20 A. No.</p> <p>21 Q. Was there a time when you were the</p> <p>22 commanding officer for PAL, where anyone from</p> <p>23 PAL gave you a written reprimand?</p> <p>24 A. No. Ted Qualli verbally abused me</p> <p>25 several times, by coming into my office, yelling</p>

<p style="text-align: right;">Page 78</p> <p>1 E. CINTRON</p> <p>2 at me.</p> <p>3 Q. Well, so -- okay. So Ted came into</p> <p>4 your office and yelled. But did he ever do</p> <p>5 anything, did he ever suspend you or give you a</p> <p>6 written warning or any kind of tangible,</p> <p>7 adverse --</p> <p>8 A. No.</p> <p>9 Q. -- [unintelligible]?</p> <p>10 A. No.</p> <p>11 Q. Did anyone from PAL suspend you?</p> <p>12 A. No.</p> <p>13 Q. Did anyone from PAL take away or</p> <p>14 reduce your pay or benefits?</p> <p>15 A. I believe so.</p> <p>16 Q. Can you tell me why you believe</p> <p>17 that?</p> <p>18 A. Not directly, but indirectly they</p> <p>19 did.</p> <p>20 Q. How did they do that?</p> <p>21 A. Because it was me voicing my opinion</p> <p>22 about the inequality in the centers, about the</p> <p>23 way I was being mistreated that led for me to</p> <p>24 have to leave this job. And I went from</p> <p>25 \$120,000 to \$56,000 a year. My whole career was</p>	<p style="text-align: right;">Page 80</p> <p>1 E. CINTRON</p> <p>2 A. I believe that it was several</p> <p>3 reasons. I believe that from the beginning, I</p> <p>4 felt that because they always had these private</p> <p>5 meetings among the men, that I would never be</p> <p>6 included in, they made all the decisions, and</p> <p>7 then Ted would come down and dictate to me how</p> <p>8 things were going to be, even if that meant that</p> <p>9 departmental policies would be violated, even if</p> <p>10 that meant that I contested paying officers</p> <p>11 under the table, which is against the law, and</p> <p>12 things of that nature. Me voicing my opinion</p> <p>13 about having kids attend the Wissinoming Center</p> <p>14 that I closed down.</p> <p>15 And the reason I closed the Wissinoming</p> <p>16 PAL center down was because my first week at</p> <p>17 PAL, the first thing that we decided to do was</p> <p>18 to visit the centers, so that I could get to</p> <p>19 know the centers and where they are located and</p> <p>20 how things operate, and basically do a tour of</p> <p>21 all the centers in the city. And we took three</p> <p>22 days out in the calendar to be able to do that</p> <p>23 because there was 15 centers located throughout</p> <p>24 the city.</p> <p>25 When we went -- on the second day that we</p>
<p style="text-align: right;">Page 79</p> <p>1 E. CINTRON</p> <p>2 interrupted and ended, and it was as a result of</p> <p>3 their actions.</p> <p>4 Q. Their actions, how? Someone from</p> <p>5 PAL?</p> <p>6 A. Yes.</p> <p>7 Q. And can you tell me who specifically</p> <p>8 at PAL did that?</p> <p>9 A. Bernie Prazenica, Ron Rabena, Ted</p> <p>10 Qualli. Ted Qualli, as he said many times,</p> <p>11 acted under the guidance of the board. And a</p> <p>12 lot of the decisions he made to circumvent me</p> <p>13 was based on the meetings that he would have</p> <p>14 with -- the decision-making meetings that he</p> <p>15 would have with Bernie Prazenica and Ron Rabena</p> <p>16 that I was excluded from. And based on that, it</p> <p>17 led to me having to leave the job, because I was</p> <p>18 put in a hostile work environment where I was</p> <p>19 being circumvented, disrespected, belittled, and</p> <p>20 unable to do my job accurately, because they</p> <p>21 refused to work jointly with me like we were</p> <p>22 supposed to be working together.</p> <p>23 Q. What is your understanding of why</p> <p>24 Ted did those things? What was the cause of his</p> <p>25 actions?</p>	<p style="text-align: right;">Page 81</p> <p>1 E. CINTRON</p> <p>2 went out, we went to visit the Wissinoming PAL</p> <p>3 Center, and when I walked in the center, it was</p> <p>4 in deplorable conditions. It smelled like</p> <p>5 mildew and mold. And I immediately got sick,</p> <p>6 couldn't even stay in the building. I had to</p> <p>7 run out and throw up.</p> <p>8 And I was followed outside by Kevin Frame,</p> <p>9 the facilities manager, Sunny Lee -- and --</p> <p>10 Sunny Lee, and they both began to talk to me</p> <p>11 about problems they had in the building in the</p> <p>12 past that led to a lawsuit. I think it was</p> <p>13 Zenak versus the City of Philadelphia. And when</p> <p>14 I looked up, Ted was coming out, and I saw him,</p> <p>15 as I was throwing up, through my peripheral</p> <p>16 vision. And I saw Ted with his finger telling</p> <p>17 them not to tell me anything. Like, basically</p> <p>18 telling them, signaling them not to tell me</p> <p>19 anything.</p> <p>20 And at that point I knew something was</p> <p>21 going on. It's my, what, third day at PAL. So,</p> <p>22 you know, I was feeling sick at the moment. So</p> <p>23 I didn't know what was going on.</p> <p>24 So I then decided to go to visit the PAL</p> <p>25 Center on my own. And this time Officer Younger</p>

<p style="text-align: right;">Page 82</p> <p>1 E. CINTRON</p> <p>2 was in the center, who was the officer</p> <p>3 assigned -- was the officer assigned to the</p> <p>4 center, and he was -- had a mask on, and he was</p> <p>5 cleaning mold off the walls and the floor. And</p> <p>6 told -- and explained to me that he was mopping</p> <p>7 the floors and cleaning up the center so that he</p> <p>8 can reopen up the center for the kids.</p> <p>9 And I told him, Well, how long has this</p> <p>10 been going on? And he said, I'll show you,</p> <p>11 Lieutenant, and he went to his office and got a</p> <p>12 stack of papers that he had been reporting that</p> <p>13 this mold and mildew in the center has been</p> <p>14 going on for over three years. And that he was</p> <p>15 put in that center because the white officer</p> <p>16 didn't want to work the center no more, and him</p> <p>17 being a new officer assigned to PAL, they put</p> <p>18 him there. And he ended up having to work that</p> <p>19 center.</p> <p>20 He gave me a stack of papers with</p> <p>21 pictures, multiple emails that dated back three</p> <p>22 years, and nothing was ever done to remedy the</p> <p>23 mold and the mildew and the problems in that</p> <p>24 center that left water on the floor, causing</p> <p>25 kids to fall, and different injuries that the</p>	<p style="text-align: right;">Page 84</p> <p>1 E. CINTRON</p> <p>2 And at that point, I called both my</p> <p>3 sergeants to meet me at the center, and I called</p> <p>4 Ted Qualli to also come to the center and meet</p> <p>5 me at the center.</p> <p>6 As a commanding officer with experience, I</p> <p>7 know that it's not wise to make decisions soon</p> <p>8 after you get into a unit, and I've never done</p> <p>9 that. But in this situation, it broke my heart</p> <p>10 that the kids had to endure having to come to a</p> <p>11 center under those conditions. And I</p> <p>12 immediately shut the center down and had to make</p> <p>13 that decision, which would have been logical for</p> <p>14 any person to make.</p> <p>15 And I told the officer, I don't want you</p> <p>16 to unpack anything or do anything. A</p> <p>17 professional really has to come in here to clean</p> <p>18 up this mess. And I told him, Because as of</p> <p>19 now, the center is going to be closed.</p> <p>20 And I did this when the sergeants and Ted</p> <p>21 Qualli was present. And Ted Qualli immediately</p> <p>22 told me, You can't do that. The board is the</p> <p>23 only one that can make that decision. And I</p> <p>24 told Ted Qualli that I would have to disagree</p> <p>25 because, as a commanding officer, it's my</p>
<p style="text-align: right;">Page 83</p> <p>1 E. CINTRON</p> <p>2 officer reported.</p> <p>3 I then asked the officer, Was it ever</p> <p>4 fixed? And he explained to me that when the</p> <p>5 city had the judgment in the other case, they</p> <p>6 patched it up by cleaning it and painting over</p> <p>7 it, but they really never took care of the</p> <p>8 actual problems.</p> <p>9 And he's been dealing with this issue for</p> <p>10 a long time, which caused him to get respiratory</p> <p>11 problems, having to seek medical attention, and</p> <p>12 the center that used to be vibrant of 150 kids</p> <p>13 attending the center, stopped coming because of</p> <p>14 the mildew and smell in the center, and kids</p> <p>15 having to be taken to the hospital for asthma</p> <p>16 treatments and other treatments because of the</p> <p>17 problems at that PAL center.</p> <p>18 He says, To be honest with you, the only</p> <p>19 kids that come here is the kids that don't have</p> <p>20 nowhere to go after school, and that's about 12,</p> <p>21 13 kids.</p> <p>22 He said, The problem is, they don't want</p> <p>23 to shut the center down because of funding.</p> <p>24 They get a lot of funding for the center, even</p> <p>25 though it's not a viable center right now.</p>	<p style="text-align: right;">Page 85</p> <p>1 E. CINTRON</p> <p>2 responsibility to ensure that the kids are safe</p> <p>3 and that the officers are safe and that the</p> <p>4 community is safe, and that I cannot, in good</p> <p>5 judgment, leave a center open knowing that these</p> <p>6 kids were being exposed to mold spores and</p> <p>7 deplorable conditions like the ones I saw at the</p> <p>8 center.</p> <p>9 At that point, I shut down the center. A</p> <p>10 few days later -- call it intuition -- I went</p> <p>11 back to the center to make sure that the work</p> <p>12 that -- was getting done and that they were</p> <p>13 cleaning up, and that the maintenance team was</p> <p>14 out there, because they were supposed to go out</p> <p>15 there to check out the center.</p> <p>16 And when I got there, Officer Younger was</p> <p>17 in there again, and he was setting up the</p> <p>18 classroom and setting up supplies. And when I</p> <p>19 asked him, What are you doing? The center is</p> <p>20 closed down. You're supposed to be reassigned</p> <p>21 to another center. And he said that Sergeant</p> <p>22 Faust and Sergeant Irving ordered him to reopen</p> <p>23 up the center because Ted told them to open up</p> <p>24 the center. Because I had no authority to shut</p> <p>25 down the center the way that I did.</p>

<p style="text-align: right;">Page 86</p> <p>1 E. CINTRON</p> <p>2 And they did this behind my back because</p> <p>3 neither sergeants informed me that they were</p> <p>4 going to do that, because if they had informed</p> <p>5 me, I would have -- it was a standing order on</p> <p>6 my part that the center was to remain closed.</p> <p>7 And they went behind my back because Ted told</p> <p>8 them to open it and not to listen to me.</p> <p>9 Q. So are Faust and Irving the two</p> <p>10 sergeants in the PAL unit?</p> <p>11 A. Yes.</p> <p>12 Q. And who is it that told you Ted told</p> <p>13 them to do this?</p> <p>14 A. Both sergeants. Ted Qualli was</p> <p>15 called to come to the center again. This time</p> <p>16 when he showed up at the center, he confirmed</p> <p>17 what the sergeant said. He told me, Lieutenant,</p> <p>18 like I told you, you are not -- I spoke to the</p> <p>19 board, and you're not allowed to shut down the</p> <p>20 center. We would lose a lot of funding if they</p> <p>21 know that this is not a viable center.</p> <p>22 And I stated to him that money, the money</p> <p>23 that they get for the center was not more</p> <p>24 important than the safety of the kids.</p> <p>25 And I later found out that they were</p>	<p style="text-align: right;">Page 88</p> <p>1 E. CINTRON</p> <p>2 time we talked about it, Ted Qualli would yell</p> <p>3 and get aggravated because, according to him,</p> <p>4 he's getting pressure from the board to reopen</p> <p>5 up that center, even though conditions to fix</p> <p>6 the center hadn't been resolved.</p> <p>7 We then had a meeting with the facilities</p> <p>8 committee who showed up at the PAL center. We</p> <p>9 coordinated a meeting so that they could be</p> <p>10 there and see for themselves what I observed.</p> <p>11 And when they got there, one of the board</p> <p>12 members agreed that the conditions were</p> <p>13 deplorable and scolded Ted Qualli in front of</p> <p>14 me, and told him, It's a shame that you allowed</p> <p>15 this to go for this long. And from that point</p> <p>16 on, the center remained closed.</p> <p>17 Q. Is it your -- as it relates -- so</p> <p>18 let me back up. So the center closed in the</p> <p>19 fall of 2016?</p> <p>20 A. Yes.</p> <p>21 Q. Is it -- was it one of your -- was</p> <p>22 it your understanding that one of your job</p> <p>23 funding -- pardon me -- job responsibilities was</p> <p>24 to ensure that the PAL facilities were safe?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 87</p> <p>1 E. CINTRON</p> <p>2 telling the funders that supported the center,</p> <p>3 that it was a viable center, that 150-plus kids</p> <p>4 attended the center when, in fact, that was not</p> <p>5 true.</p> <p>6 Q. The -- so this incident with</p> <p>7 Wissinoming Center, that occurred, you said,</p> <p>8 shortly after you joined PAL?</p> <p>9 A. My first week.</p> <p>10 Q. And was the center ever formally</p> <p>11 closed?</p> <p>12 A. Yes, because -- yeah, it was</p> <p>13 formally closed when I closed it down. I did</p> <p>14 discuss the matter with Deputy Commissioner</p> <p>15 Patterson who agreed with my decision. And the</p> <p>16 center was to remain shut down until it was</p> <p>17 properly fixed.</p> <p>18 Now, Ted Qualli's concern was that it's</p> <p>19 not a building that is owned by PAL, which is</p> <p>20 why they didn't want to invest the money in</p> <p>21 fixing the problem that kept causing the mold</p> <p>22 to -- the growth of the mold. And I understood</p> <p>23 that. But they kept trying to convince me to</p> <p>24 reopen the center, and it was always, like,</p> <p>25 pressure to reopen up the center. And every</p>	<p style="text-align: right;">Page 89</p> <p>1 E. CINTRON</p> <p>2 Q. And that they were adequately</p> <p>3 funded?</p> <p>4 A. Yes.</p> <p>5 Q. And safe for kids to utilize those</p> <p>6 buildings?</p> <p>7 A. Yes.</p> <p>8 Q. And so in terms of the complaints</p> <p>9 that you were voicing, and the concerns that you</p> <p>10 had, that was something -- an exercise that you</p> <p>11 viewed in performing your functions as the</p> <p>12 commanding officer, correct?</p> <p>13 A. Yes.</p> <p>14 Q. Did at any point in -- well, did</p> <p>15 that complaint about the Wissinoming Center, did</p> <p>16 that have anything to do with your gender?</p> <p>17 A. With my gender? Me making the</p> <p>18 decision? I made the decision because it</p> <p>19 was unsafe for the kids.</p> <p>20 Q. Right. No, I -- but what I'm trying</p> <p>21 to find out is, did that -- so did the complaint</p> <p>22 have anything to do with your gender?</p> <p>23 MR. GREEN: Objection.</p> <p>24 A. I don't know what you're asking.</p> <p>25 Q. So that complaint, the issue</p>

<p style="text-align: right;">Page 90</p> <p>1 E. CINTRON</p> <p>2 relating to the Wissinoming PAL Center, that</p> <p>3 was -- if I understood what you said, that was</p> <p>4 one of the reasons that you lost your job; is</p> <p>5 that correct?</p> <p>6 A. I believe that it was accumulation</p> <p>7 of different events that I reported. And the</p> <p>8 board members circumventing me to do things</p> <p>9 their way, is what caused me to have the</p> <p>10 stress-related problems that led to PTSD and</p> <p>11 everything else that I was experiencing while I</p> <p>12 was at PAL, and now.</p> <p>13 Q. Right. So the culmination of</p> <p>14 events, the issues about the Wissinoming PAL</p> <p>15 Center, that is one of those events; is that</p> <p>16 correct?</p> <p>17 A. Yes.</p> <p>18 Q. And I just want to be clear, the --</p> <p>19 your -- the issues relating to that building</p> <p>20 have nothing to do with your gender?</p> <p>21 A. Well, I believe that when the PAL</p> <p>22 team that would get together with Ted, and not</p> <p>23 me, to make decisions was gender-related.</p> <p>24 Q. But I'm just asking, the complaint</p> <p>25 about the Wissinoming Center, leave aside the</p>	<p style="text-align: right;">Page 92</p> <p>1 E. CINTRON</p> <p>2 after you joined, and then never went to any</p> <p>3 other meetings?</p> <p>4 A. Which was the second week I was at</p> <p>5 PAL. After that I never was invited to the</p> <p>6 meeting, which is the decision-making meeting</p> <p>7 about everything pertaining to PAL.</p> <p>8 Q. Let me back up. I want to try to be</p> <p>9 specific in the questions I want to ask you.</p> <p>10 So, earlier, I had asked you what adverse</p> <p>11 actions PAL had taken against you. And I think,</p> <p>12 if I have this correct, you said that the</p> <p>13 incident you can identify is that the actions in</p> <p>14 taking away your job; is that correct?</p> <p>15 A. Yes. I believe that by not</p> <p>16 implementing or going against implementing the</p> <p>17 memorandum of understanding, that would show</p> <p>18 authority of who is responsible for what, and</p> <p>19 how this collaboration works, was a direct</p> <p>20 result of me not being there, because they</p> <p>21 didn't want to implement it, and they didn't</p> <p>22 want me to have any authority over PAL matters.</p> <p>23 MR. GOLDEN: Let's do PAL-4.</p> <p>24 (Letter is received and marked as</p> <p>25 Exhibit PAL-4 for identification, as</p>
<p style="text-align: right;">Page 91</p> <p>1 E. CINTRON</p> <p>2 meetings, that complaint did not -- you were not</p> <p>3 complaining that you're doing this "because of</p> <p>4 my gender," did you?</p> <p>5 A. What I'm saying is their insistence</p> <p>6 in reopening up that center against my wishes,</p> <p>7 and them planning to reopen the center without</p> <p>8 my input, was gender-related, yes.</p> <p>9 Q. And was it --</p> <p>10 A. Because they were excluding me as</p> <p>11 the commanding officer, a woman, from these</p> <p>12 important decision-making meetings that</p> <p>13 pertained to Wissinoming.</p> <p>14 Q. Who excluded you from the meetings?</p> <p>15 A. When I first arrived at PAL, Bernie</p> <p>16 Prazenica told me that there is a monthly</p> <p>17 meeting that I would attend with Ted. And I</p> <p>18 went to the first meeting, and for the next</p> <p>19 three years, I never attended the meeting again.</p> <p>20 I was never invited. I was never included in</p> <p>21 the email. I was never told what decisions were</p> <p>22 made at these meetings. All I know is that Ted</p> <p>23 Qualli would come to me and basically bark</p> <p>24 orders as to what the board wanted.</p> <p>25 Q. So you went to one monthly meeting</p>	<p style="text-align: right;">Page 93</p> <p>1 E. CINTRON</p> <p>2 of this date.)</p> <p>3 THE VIDEOGRAPHER: The time is</p> <p>4 1:14. We are now off the record.</p> <p>5 (A break was taken.)</p> <p>6 THE VIDEOGRAPHER: The time is</p> <p>7 1:15. We are now on the record.</p> <p>8 Q. Ms. Cintron, I've just identified</p> <p>9 Exhibit PAL-4. Do you recall the first -- have</p> <p>10 you ever seen this document before today?</p> <p>11 A. I briefly saw it at Internal</p> <p>12 Affairs.</p> <p>13 Q. And do you recall what -- when you</p> <p>14 say "Internal Affairs," was that a meeting with</p> <p>15 someone?</p> <p>16 A. An interview when I was deemed the</p> <p>17 target, and an internal investigation.</p> <p>18 Q. And who was conducting that</p> <p>19 investigation?</p> <p>20 A. Internal Affairs.</p> <p>21 Q. And so during that -- was there one</p> <p>22 meeting or more than one meeting?</p> <p>23 A. I was interviewed one time, but I</p> <p>24 think I went up there, like, two or three times</p> <p>25 to sign paperwork.</p>

<p style="text-align: right;">Page 94</p> <p>1 E. CINTRON</p> <p>2 Q. And it was during one of those</p> <p>3 meetings that you first saw this letter?</p> <p>4 A. Yes, during the interview.</p> <p>5 Q. Do you know who drafted this letter?</p> <p>6 A. I know what happened prior to the</p> <p>7 letter --</p> <p>8 MR. GREEN: I'm going to object</p> <p>9 to that particular question. Don't</p> <p>10 answer it. It says: A Concerned</p> <p>11 PAL. I mean, that's the only</p> <p>12 indication of who drafted this at</p> <p>13 this point.</p> <p>14 MR. GOLDEN: Well, that letter</p> <p>15 may say that. I'm just asking if</p> <p>16 the witness has any firsthand</p> <p>17 knowledge upon which she can say, I</p> <p>18 know who drafted it.</p> <p>19 MR. GREEN: You mean who a</p> <p>20 Concerned PAL is, the identity of a</p> <p>21 Concerned PAL?</p> <p>22 MR. GOLDEN: Okay. I don't want</p> <p>23 a speaking objection on the record.</p> <p>24 If you're going to instruct her not</p> <p>25 to answer my questions then we can</p>	<p style="text-align: right;">Page 96</p> <p>1 E. CINTRON</p> <p>2 in writing?</p> <p>3 A. It was both by phone and in person.</p> <p>4 Q. Can you tell me about everything you</p> <p>5 said to Detective -- or, pardon me, Deputy</p> <p>6 Commissioner Patterson about that complaint.</p> <p>7 A. What complaint?</p> <p>8 Q. The one about the Wissinoming PAL</p> <p>9 Center.</p> <p>10 A. Well, I explained -- informed him</p> <p>11 everything that I stated to you and my decision</p> <p>12 why -- as to why I closed down the center. And</p> <p>13 he agreed that it was a good decision to make</p> <p>14 because the safety of the kids and the staff</p> <p>15 comes first.</p> <p>16 Q. Is there -- are there any documents</p> <p>17 in which you're aware that say that the decision</p> <p>18 to close a PAL center would be within the</p> <p>19 discretion of the commanding officer?</p> <p>20 A. No. My decision to close was based</p> <p>21 on the fact that, as the commanding officer, one</p> <p>22 of my primary jobs is for the safety of the</p> <p>23 officers and the community.</p> <p>24 Q. And just so I'm clear, where -- is</p> <p>25 that your understanding or is there a job</p>
<p style="text-align: right;">Page 95</p> <p>1 E. CINTRON</p> <p>2 break. I just want to ask a</p> <p>3 specific and narrow question.</p> <p>4 MR. GREEN: Do you know who a</p> <p>5 Concerned PAL is specifically,</p> <p>6 Ms. Cintron?</p> <p>7 THE WITNESS: No.</p> <p>8 Q. So you do not know who wrote this</p> <p>9 letter?</p> <p>10 A. No.</p> <p>11 MR. GOLDEN: That's all the</p> <p>12 questions I have about that exhibit.</p> <p>13 We can go off the record.</p> <p>14 THE VIDEOGRAPHER: The time is</p> <p>15 1:17. We are now off the record.</p> <p>16 (A lunch break was taken.)</p> <p>17 THE VIDEOGRAPHER: The time is</p> <p>18 2:29. We are now on the record.</p> <p>19 FURTHER EXAMINATION</p> <p>20 Q. Ms. Cintron, did you complain to</p> <p>21 Deputy Commissioner Patterson in 2016 about the</p> <p>22 conditions at the Wissinoming PAL Center?</p> <p>23 A. Yes. I reported the incident, the</p> <p>24 situation to him.</p> <p>25 Q. Was that done in person or by email</p>	<p style="text-align: right;">Page 97</p> <p>1 E. CINTRON</p> <p>2 description for the commanding officer?</p> <p>3 A. That's -- every police officer has</p> <p>4 the duty to -- to make sure that the safety of</p> <p>5 self and others comes first.</p> <p>6 Q. But what I'm asking you is that when</p> <p>7 you -- as the commanding officer for PAL, are</p> <p>8 you aware of a written job description for the</p> <p>9 commanding officer?</p> <p>10 A. There wasn't one in terms of</p> <p>11 something in writing, which is why we -- the --</p> <p>12 Commissioner Ross wanted to implement the</p> <p>13 memorandum of understanding when Ted Qualli and</p> <p>14 the board wanted to implement the policies that</p> <p>15 they attempted to implement.</p> <p>16 Q. What is your understanding of why</p> <p>17 that policy wasn't implemented?</p> <p>18 A. It wasn't implemented because it was</p> <p>19 one-sided. It completely took all of the</p> <p>20 authority away from the planning officer to be</p> <p>21 involved in any decision, and leaving the</p> <p>22 director and the PAL board to make all</p> <p>23 decisions.</p> <p>24 Q. So who told you it was one-sided?</p> <p>25 A. From reading it. And having</p>

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2 Commissioner Ross review it.

3 Q. Did Commissioner Ross tell you it

4 was one-sided?

5 A. Those are my words. But he agreed

6 that in the -- the writing of this memorandum

7 did not accurately show the collaboration

8 between the City of Philadelphia Police

9 Department and PAL, the nonprofit.

10 Q. So those were his words?

11 A. Yes. In the presence of Ron

12 Prazenica and -- I mean, Ron Rabena, Prazenica,

13 Ted Qualli, Deputy Commissioner Patterson.

14 After -- a chance was given to Captain Hailey to

15 review it before this meeting took place, so it

16 was per Captain Hailey, after careful review of

17 that policy, that the memorandum was to be

18 implemented per Commissioner Ross.

19 Q. Whose idea was it to draft the

20 memorandum of understanding?

21 A. Commissioner Ross.

22 Q. And did he tell you why he thought

23 it should be implemented?

24 A. The explanation I just gave you.

25 Q. So that's what he told you?

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2 A. That's what he said to all of us at

3 the meeting.

4 Q. Earlier, I had asked about the

5 adverse actions that PAL had taken against you,

6 and you had identified being excluded from

7 meetings, and you then identified monthly

8 meetings. Were there -- apart from the monthly

9 meetings, were you excluded from any other

10 meetings?

11 A. I was excluded from every meeting,

12 every decision-making meeting.

13 Q. How do you know what those meetings

14 were involving if you were not in them?

15 A. Because they explained to me that I

16 would be invited to these meetings, and this is

17 where the decisions were made. And I attended

18 the meeting one time, but then was never invited

19 to attend again.

20 Q. So how do you know that any

21 decisions were made at subsequent meetings?

22 A. Because Ted Qualli would come to a

23 general -- you know, our general office meetings

24 and tell us what he was instructed to do at PAL

25 per the board during those meetings.

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2 Q. So it's your testimony that Ted

3 would come --

4 A. Ted would go to the meetings.

5 Q. And then come -- and would come to

6 you and say, This is the decision that was made

7 in that meeting?

8 A. These are the decisions we made at

9 this meeting. This is what we are going to do.

10 Q. How were these meetings scheduled?

11 A. I believe it was monthly or every

12 other month. I'm not sure. But besides that

13 meeting, they would meet other times as well.

14 Q. Well, if you weren't invited, how

15 would you know they were occurring?

16 A. Because Ted would tell me, I'm going

17 to be meeting with Ted [sic], you know, to

18 discuss this issue or that issue. Or it would

19 be put on the calendar.

20 Q. So it would be -- you mean, like an

21 Outlook invite or something like that?

22 A. Well, he would put it on the

23 calendar that he wasn't going to be in the

24 office that day because he was attending these

25 meetings.

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2 Q. If you were aware of the meetings,

3 were you told that you were not invited?

4 A. They told me that I would be getting

5 an Outlook invite every month, which I never

6 did. And when I asked why I wasn't attending

7 these meetings, Ted said they only wanted --

8 (Court reporter clarification.)

9 A. Ted Qualli stated that they only

10 wanted to meet with him.

11 Q. And so when you say -- who do you --

12 who are you referring to by "they"?

13 A. When I would ask him why I was being

14 excluded from the decision-making meetings that

15 they held monthly with Bernie Prazenica and Ron

16 Rabena, he told me they only wanted to meet with

17 him.

18 Q. As the executive director for PAL?

19 A. Yes.

20 Q. And was it meetings with the board

21 or meetings with only Ron and Prazenica?

22 A. It was both. Sometimes they would

23 meet with the board, but the monthly meeting was

24 just with Ron Rabena. I don't know who else

25 would attend because I wasn't there, but the

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2 meeting -- the intention of the meeting was to

3 meet with either the chair or the vice-chair,

4 which was Bernie Prazenica or Ron Rabena, to

5 discuss financials, programming, everything

6 involving PAL.

7 Q. How is it -- is it your opinion that

8 you were excluded from those meetings based upon

9 your national origin?

10 A. Yes.

11 Q. And why -- what facts do you have to

12 inform that belief?

13 A. Well, there was a systemic way of

14 the board and Ted doing things at PAL. And a

15 lot of times when I would be present during

16 regular or general meetings, if they wanted to

17 talk, anything that I brought concerns about or

18 things that needed to be addressed where a

19 decision had to be made, they would always do

20 their sidebar conversations, make the decision,

21 and then, you know, either share with me or not

22 share with me what -- the decisions that were

23 made.

24 Q. So those were concerns that you

25 raised in meetings with Ted?

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2 A. Yes. It was basically all-male

3 meetings. I was never invited to meetings that

4 the commanding officer should be present at, to

5 be able to make good decisions in a unit.

6 Q. So what I want to back up is, you

7 said that there were things that you brought up

8 that needed to be addressed, and then they would

9 do a sidebar?

10 A. If I brought up issues with budget,

11 for instance, a discrepancy in the budget that I

12 found as it pertains to the ordering of

13 trophies, where they claim -- where they stated

14 in a financial statement that PAL has spent an

15 excess of almost 50 in trophies that year, but

16 when I conducted an audit, they only had spent

17 20, and this was something that they had been

18 reporting for the previous five years.

19 When it was brought up in the general

20 meeting, when I brought it up in the general

21 meeting, and someone else mentioned that as

22 well, they said, Well, let's just have sidebars

23 on that. And Ron Rabena said it would be --

24 after this, Bernie and Ted, follow me to my

25 office to have this meeting.

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2 Q. So this was a general meeting, you

3 said?

4 A. Yes.

5 Q. And when did that occur?

6 A. 2016.

7 Q. Was this the only meeting you

8 attended?

9 A. No, I would go to the general

10 meetings. The meetings I wasn't invited to were

11 the decision-making meetings.

12 Q. So is it your testimony that no

13 decisions were made during general meetings?

14 A. No. That was just the reporting

15 from the different committees, the different

16 committees reporting out.

17 Q. So I guess what I'm trying to find

18 out is if no decisions were being made during

19 the general meetings, why are Ted, Bernie, and

20 Ron going, like, to have a sidebar?

21 A. That's something you have to ask

22 them.

23 Q. So you don't know what they were

24 deciding?

25 A. Well, no, they were talking about

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2 the topics that would come up or that I would

3 bring up.

4 Q. And -- but you don't know what they

5 discussed during those sidebars?

6 A. No.

7 Q. I want to again ask -- the exclusion

8 from the meetings, how do you know you were

9 excluded from the meetings based on your

10 national origin?

11 A. I was a female commander in an

12 important unit like PAL, and I was being

13 excluded from attending the meetings that had to

14 do with making decisions under my authority as

15 commanding officer. Yet all of the males that

16 were also involved making decisions would be at

17 these meetings. So it's -- it was -- you know,

18 it was vividly known that it was me who they

19 didn't want in the meeting.

20 Q. So what I want to know is, they

21 didn't want you in the meeting, how do you know

22 that had to do with your national origin?

23 A. I'm the top female commander at PAL

24 responsible for making decisions, responsible

25 for the officers, responsible for the kids,

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2 responsible for safety, the facilities, the
3 centers, everything. But I wasn't invited to
4 the meeting that was all male, five males. So
5 it's not about -- it's about their actions that
6 showed that they didn't want me in there,
7 because they didn't respect me as a female
8 being, an authority. They didn't respect my
9 rank, they didn't respect the fact that I
10 would -- was advocating for the children in the
11 community.
12 Q. So did any of those -- did any of
13 the individuals in those private meetings ever
14 tell you, You are being excluded from this
15 meeting because of your national origin?
16 MR. GREEN: Objection. Asked and
17 answered.
18 Do you understand what the term
19 "national origin" means?
20 THE WITNESS: Yes.
21 MR. GREEN: What does it mean?
22 MS. ULAK: I'm going to object to
23 that.
24 BY MR. GOLDEN:
25 Q. Yeah, go ahead. Do you know what

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2 "national origin" means? I'm just using the
3 term in the complaint. So --
4 A. Yes. My national origin may be
5 Hispanic, may be a woman, my gender being a
6 female. When you have another female like
7 Maureen Rush calling you and telling you, "let
8 the boys handle it," and making the statement,
9 "sit back and collect a check," that implies
10 that, as a female, they don't want me to be
11 involved.
12 Q. Okay. So let me ask the question a
13 different way first.
14 Did any of the individuals in those
15 meetings tell you, you were excluded because you
16 were a woman?
17 A. They didn't verbally say it, but
18 their actions showed it.
19 Q. All right. So I'll come back to the
20 actions. So I just want to confirm that they
21 never verbally told you you were excluded
22 because you were a woman; is that correct?
23 A. Of course not. They didn't say it
24 verbally.
25 Q. Did any of those individuals

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2 verbally tell you you were being excluded from
3 those meetings because you were a Latina?
4 A. Not verbally, but it was -- I had
5 several incidents involving Bernie Prazenica,
6 including an incident that an officer reported,
7 because Bernie Prazenica was in the habit of
8 walking into the room, just like Sullivan, and
9 shaking everyone's hand, but skipping on the
10 minorities, including me.
11 Q. Can you give me --
12 A. When that was brought to his
13 attention, he stated that he's just germaphobic
14 and that he didn't mean it in that way. But
15 every meeting he did the exact same -- I mean,
16 every time there was a group, he would literally
17 walk by, shake people's hands. When he got to a
18 black officer or Hispanic officer, he would
19 literally bypass them and shake the next
20 person's hand who happened to be white.
21 Q. And your testimony is that every
22 meeting you were in with Bernie Prazenica, he
23 did that?
24 A. Ninety percent of the meetings, yes.
25 I had Officer Hampton, who was not aware that I

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2 was experiencing that, make a complaint about
3 the same matter, because he noticed it. It
4 happened at one of the meetings that he
5 attended.
6 Q. So Officer Hatton [sic] submitted a
7 similar complaint?
8 A. Yes.
9 MR. GREEN: Hampton.
10 A. Hampton.
11 Q. Hampton.
12 A. We were at a general board meeting,
13 and several of the officers were invited to talk
14 about their centers, and when he approached the
15 officers, he bypassed Officer Hampton and shook
16 everybody else's hand before him and after him,
17 but would not shake Officer Hampton's hand.
18 Even when Officer Hampton extended his hand to
19 Bernie, Bernie stated he was germaphobic, but
20 the officer then observed him going to the other
21 side of the room and continuing shaking
22 everybody else's hand.
23 Q. So that meeting you recall --
24 A. So he felt offended.
25 Q. Do you recall when that meeting

<p style="text-align: right;">Page 110</p> <p>1 E. CINTRON</p> <p>2 occurred?</p> <p>3 A. It was one of the board meetings,</p> <p>4 like 2017, I believe. I don't remember the year</p> <p>5 it was.</p> <p>6 Q. And Officer Hampton, he was the --</p> <p>7 was he -- was that room -- was he the only</p> <p>8 African-American in the room?</p> <p>9 A. No, there were several other</p> <p>10 African-Americans in the room, but he was the</p> <p>11 only one that complained that he noticed that</p> <p>12 him being the only African-American in the</p> <p>13 circle where he was standing, that Bernie</p> <p>14 Prazenica bypassed him and continued to shake</p> <p>15 everybody else's hand, just like he had did to</p> <p>16 me previously.</p> <p>17 Q. So is it -- am I fair to understand</p> <p>18 that Bernie did not shake hands -- that he</p> <p>19 skipped shaking -- he did not shake hands with</p> <p>20 any African-American in that room; is that what</p> <p>21 you're testifying?</p> <p>22 A. I'm speaking to him, because he</p> <p>23 reported that to me. No one else reported that</p> <p>24 to me.</p> <p>25 Q. Did you personally observe that?</p>	<p style="text-align: right;">Page 112</p> <p>1 E. CINTRON</p> <p>2 safety in all of the centers. We had issues in</p> <p>3 a lot of the centers. I'll put it that way.</p> <p>4 Q. What I want to ask next is, you've</p> <p>5 given me an example of Officer Hampton</p> <p>6 complaining about Bernie. What I want to ask</p> <p>7 is, can you tell me, as it relates to Bernie and</p> <p>8 you, yourself, things that you witnessed with</p> <p>9 Bernie? Can you tell me what incidents occurred</p> <p>10 that you felt you were being discriminated</p> <p>11 against or unfairly treated because of your</p> <p>12 gender or being Latina?</p> <p>13 A. Well, he did the same thing to me as</p> <p>14 far as not shaking my hand whenever I saw him.</p> <p>15 And in terms of me being Latina, I just</p> <p>16 feel that, as a representative of the community</p> <p>17 I served, I know the names of the community, and</p> <p>18 I noticed there would be preferential treatment</p> <p>19 taking place in the centers where white kids</p> <p>20 attended most, and centers where black and</p> <p>21 underprivileged children attended, there was a</p> <p>22 difference in the programs. There was a</p> <p>23 difference in the funding. There was a</p> <p>24 difference in the way the facilities looked, you</p> <p>25 know, and how they would prioritize fixing</p>
<p style="text-align: right;">Page 111</p> <p>1 E. CINTRON</p> <p>2 A. I didn't observe it. He told me</p> <p>3 about it. And he initially went and told Ted</p> <p>4 about it, What's that all about? you know, he</p> <p>5 told Ted. And then both of them came up to me,</p> <p>6 and we were -- and he told me what happened.</p> <p>7 Q. So what I want to back up and ask --</p> <p>8 so you also said that the -- the people that</p> <p>9 excluded you, they didn't respect your rank; is</p> <p>10 that correct?</p> <p>11 A. The people -- when you say "people,"</p> <p>12 are you talking about Bernie Prazenica?</p> <p>13 Q. Well, you said that -- when I was</p> <p>14 talking about being excluded from meetings, you</p> <p>15 said they didn't respect your rank and they</p> <p>16 didn't respect your advocacy for the kids. And</p> <p>17 I'm trying to find out who is the "they" that --</p> <p>18 A. Ted Qualli, Ron Rabena and Bernie</p> <p>19 Prazenica.</p> <p>20 Q. And so --</p> <p>21 A. They were upset because I advocated</p> <p>22 for the children and reported different things</p> <p>23 like safety at Wissinoming PAL. And I would,</p> <p>24 you know, talk to Bernie and Ron about the</p> <p>25 different issues we were having in terms of</p>	<p style="text-align: right;">Page 113</p> <p>1 E. CINTRON</p> <p>2 certain things in certain centers, but left a</p> <p>3 center like Wissinoming three years infested</p> <p>4 with mold. Because that was not the only center</p> <p>5 that we had issues with.</p> <p>6 Q. So I need to reframe this question.</p> <p>7 I understand what you're saying about the</p> <p>8 PAL centers. What I'm asking you about is what</p> <p>9 are the things the Bernie Prazenica did to you</p> <p>10 where you felt he did them because of your</p> <p>11 gender or national origin.</p> <p>12 A. I feel that because I was a Latina</p> <p>13 commander in the unit, by being excluded is</p> <p>14 enough. Being excluded from the decision-making</p> <p>15 meetings is enough, because he literally was</p> <p>16 taking my authority away from me to be able to</p> <p>17 function properly at my job, to be able to</p> <p>18 properly do what I needed to do to service the</p> <p>19 communities I served. And whenever I would</p> <p>20 bring up issues of inequality, they did nothing</p> <p>21 about it. They continued with their practices.</p> <p>22 They continued doing the things that they were</p> <p>23 doing that was very uneven.</p> <p>24 You know, I can give you some examples</p> <p>25 about the programs. You know, we have programs</p>

<p style="text-align: right;">Page 114</p> <p>1 E. CINTRON</p> <p>2 like the wrestling program at Rizzo PAL. Rizzo</p> <p>3 PAL is a center that is predominantly all white</p> <p>4 children, and the Rizzo PAL wrestling team gets</p> <p>5 to travel, including going to Disney World. And</p> <p>6 in the centers where there's predominantly black</p> <p>7 children, where they prefer to play basketball,</p> <p>8 those officers are not allowed to do travel ball</p> <p>9 because they don't want the kids to leave the</p> <p>10 state. So why one group of kids is allowed to</p> <p>11 leave the state while the other one is being</p> <p>12 told, No, it's part of the rules, they can't --</p> <p>13 we can't do it. Even though their biggest</p> <p>14 endowment is the Josh Harris Foundation, which</p> <p>15 gives them enough money for a better basketball</p> <p>16 program.</p> <p>17 Q. Why is it that the basketball team</p> <p>18 does not leave the state?</p> <p>19 A. Because Ted said they are not</p> <p>20 allowed to leave the state because it's a PAL</p> <p>21 policy, but yet they let the wrestling team</p> <p>22 travel out of state.</p> <p>23 Q. So Ted told you that that was the</p> <p>24 policy?</p> <p>25 A. And so did the board at several</p>	<p style="text-align: right;">Page 116</p> <p>1 E. CINTRON</p> <p>2 and the board that the officers had submitted a</p> <p>3 proposal, which was better than the way they</p> <p>4 handled boxing back in the day where, this time,</p> <p>5 instead of being ran by the officers, it would</p> <p>6 have been a professional boxer. They wouldn't</p> <p>7 be allowed to actually fight matches. It would</p> <p>8 just be learning the skill of boxing, you know,</p> <p>9 just because it's an outlet for the kids. And</p> <p>10 they were denied doing it because it's too</p> <p>11 dangerous. But yet wrestling is dangerous.</p> <p>12 They have an outside organization that runs</p> <p>13 under the purview of PAL, which is not a PAL</p> <p>14 program. They are basically allowing an outside</p> <p>15 entity to run a basketball program and claiming</p> <p>16 that it's PAL, while PAL is picking up the bill</p> <p>17 on that.</p> <p>18 And the same thing with gymnastics. The</p> <p>19 girls -- people have gotten hurt wrestling;</p> <p>20 broken arm, broken leg. Girls have gotten hurt</p> <p>21 doing gymnastics, again a sport that they play</p> <p>22 in a predominantly white neighbor -- practice in</p> <p>23 a predominantly white neighborhood. I would say</p> <p>24 90 percent of the girls attending that program</p> <p>25 is white little girls, or Caucasian -- better</p>
<p style="text-align: right;">Page 115</p> <p>1 E. CINTRON</p> <p>2 meetings when I brought the topic up.</p> <p>3 Q. And what is the policy? Do you know</p> <p>4 specifically what it states?</p> <p>5 A. I always asked them to show me the</p> <p>6 policy. Maybe we need to amend these policies</p> <p>7 because they are not fair and equal. And they</p> <p>8 said, That's just the way it is. They would not</p> <p>9 give me the opportunity to correct the wrongs</p> <p>10 because that's what they wanted to do.</p> <p>11 Q. So you had an opportunity -- there</p> <p>12 was -- am I correct that you recall an</p> <p>13 opportunity for the basketball team to travel</p> <p>14 out of state?</p> <p>15 A. Yes. The officer submitted</p> <p>16 different requests at different times because</p> <p>17 the kids in that neighborhood, it's an outlet</p> <p>18 for them. Because sometimes the only thing they</p> <p>19 have is a corner-street basketball court. So</p> <p>20 that's what they like to do. And they wanted to</p> <p>21 do travel ball, and they were always told that</p> <p>22 they can't do it because the kids can't travel.</p> <p>23 They also wanted to do boxing, which is</p> <p>24 one of the main sports that propelled PAL when</p> <p>25 it first opened. And I explained to Ted Qualli</p>	<p style="text-align: right;">Page 117</p> <p>1 E. CINTRON</p> <p>2 phrasing. They can fall and get hurt at any</p> <p>3 time, but yet that's acceptable.</p> <p>4 Again, that's another program that is a</p> <p>5 program that is not a PAL program, that PAL</p> <p>6 allows the company to use in a PAL facility,</p> <p>7 and, you know, pay for equipment and stuff for</p> <p>8 them, even though it's not an actual PAL</p> <p>9 program.</p> <p>10 But if you go on the site, they clearly</p> <p>11 make it look like it's their PAL-ran -- I'm</p> <p>12 sorry -- PAL-ran programs, when they are not.</p> <p>13 They are ran by other people.</p> <p>14 So they don't let an officer who is</p> <p>15 certified to do this job and to be around these</p> <p>16 kids -- kids all the time, take the kids out of</p> <p>17 state, but they allow someone that's not even</p> <p>18 part of the organization take the wrestling team</p> <p>19 to Disney.</p> <p>20 So these were the things that I would</p> <p>21 bring up as far as the, you know, inequality in</p> <p>22 terms of the programs that they were -- we were</p> <p>23 providing for the kids. And they didn't find</p> <p>24 anything wrong with it. They would just shut me</p> <p>25 down and continue their -- the disparity was so</p>

<p style="text-align: right;">Page 118</p> <p>1 E. CINTRON</p> <p>2 huge that, you know -- but they would not let me</p> <p>3 fix those problems.</p> <p>4 Q. So you said that you brought up</p> <p>5 these issues during meetings?</p> <p>6 A. Yes.</p> <p>7 Q. Who were in those meetings?</p> <p>8 A. Ted Qualli, Bernie Prazenica at the</p> <p>9 board meetings, the general board meetings. And</p> <p>10 we were bringing it up in personal</p> <p>11 conversations, and I was always told to tell</p> <p>12 officers that they cannot implement these</p> <p>13 programs.</p> <p>14 And it's okay if, funding-wise, we can't</p> <p>15 do certain things. But in the case of</p> <p>16 basketball, we get the most funding from the</p> <p>17 Josh Harris Foundation. And, you know, like, if</p> <p>18 it's not in the budget, that's understandable.</p> <p>19 But it should not be where one group of kids is</p> <p>20 allowed to do something that the minority kids</p> <p>21 are not allowed to do.</p> <p>22 Q. Is it your testimony there are no</p> <p>23 minority children on the wrestling team?</p> <p>24 A. No, I didn't say that. There's a</p> <p>25 few, but it's a predominantly white PAL center.</p>	<p style="text-align: right;">Page 120</p> <p>1 E. CINTRON</p> <p>2 is what they were doing.</p> <p>3 Q. So would they let a male Latino make</p> <p>4 that --</p> <p>5 A. I don't know what they would do, but</p> <p>6 I know that the previous commander was white,</p> <p>7 and they didn't exclude him from the meetings.</p> <p>8 Q. How do you know that?</p> <p>9 A. Because they told me that Lieutenant</p> <p>10 Eddis would attend the meetings.</p> <p>11 (Court reporter clarification.)</p> <p>12 A. Eddis.</p> <p>13 Q. E-D-D-I-S.</p> <p>14 And so when you say "they," you're</p> <p>15 referring to Ron, Bernie, and Ted?</p> <p>16 A. Yes, when they told me that I would</p> <p>17 be attending the same meeting as well, but then</p> <p>18 was not invited to attend. I was definitely</p> <p>19 treated different than my male counterparts in</p> <p>20 the unit.</p> <p>21 Q. Well, so let me ask a more specific</p> <p>22 question because then maybe I can focus what I'm</p> <p>23 asking next.</p> <p>24 You're saying that you felt treated</p> <p>25 differently as a female. And because, for</p>
<p style="text-align: right;">Page 119</p> <p>1 E. CINTRON</p> <p>2 Q. Okay. So there are some minority</p> <p>3 children on the wrestling team?</p> <p>4 A. Yes.</p> <p>5 Q. And have you -- just so I'm clear,</p> <p>6 you have not seen the policy that governs which</p> <p>7 programs can travel out of state?</p> <p>8 A. Right. They have none. They keep</p> <p>9 telling me they want to -- that they were going</p> <p>10 to establish policies because they were -- the</p> <p>11 ones that were in place were so outdated, but it</p> <p>12 was never done. Or at least they never showed</p> <p>13 them to me.</p> <p>14 Q. Just you -- just so we're clear,</p> <p>15 whatever that -- the date, I understand the</p> <p>16 complaints you are making, but I just want to</p> <p>17 come back. Bernie Prazenica, what actions did</p> <p>18 he take, apart from not shaking your hand, that</p> <p>19 made you believe he was acting towards you</p> <p>20 because you're a Latina?</p> <p>21 A. Like I mentioned, excluding me from</p> <p>22 the meetings that they would not otherwise</p> <p>23 exclude a male commander, is what they did.</p> <p>24 Excluding me from making decisions that</p> <p>25 otherwise they would let a male commander make,</p>	<p style="text-align: right;">Page 121</p> <p>1 E. CINTRON</p> <p>2 example, it was all men in those meetings. What</p> <p>3 I'm asking you is, is there anything</p> <p>4 specifically, not including being a female, are</p> <p>5 there any instances where you felt Bernie</p> <p>6 treated you differently because you're a Latina?</p> <p>7 Excluding your gender. Leave that aside for the</p> <p>8 moment.</p> <p>9 A. I just explained that to you.</p> <p>10 You're treating me differently when you won't do</p> <p>11 this to a male commander. You're treating me</p> <p>12 differently when, as the female commander of the</p> <p>13 unit, you're excluding me from meetings that I</p> <p>14 should be attending to make decisions.</p> <p>15 Q. Do you know how long Officer Eddis</p> <p>16 was the commanding officer for PAL?</p> <p>17 A. No.</p> <p>18 Q. And do you know who's the commanding</p> <p>19 officer before Eddis?</p> <p>20 A. No, I don't recall.</p> <p>21 Q. So how do you know that Commanding</p> <p>22 Officer Eddis wasn't excluded from any of the</p> <p>23 meetings?</p> <p>24 A. I don't know if he was excluded from</p> <p>25 any of the meetings, but according to Ted, he</p>

<p style="text-align: right;">Page 122</p> <p>1 E. CINTRON</p> <p>2 attended the monthly meetings with Eddis when</p> <p>3 Eddis was there.</p> <p>4 Q. So your understanding of his</p> <p>5 attendance is from Ted?</p> <p>6 A. And Bernie Prazenica and Ron, when</p> <p>7 they told me that -- when I came to PAL, that I</p> <p>8 would attend the same meetings, and it's</p> <p>9 attended with Ted on a monthly basis to talk</p> <p>10 about the problems and where they would make the</p> <p>11 decisions for PAL. So I was told that I would</p> <p>12 be invited, just like Lieutenant Eddis would be</p> <p>13 invited -- was attending those meetings, but I</p> <p>14 wasn't.</p> <p>15 Q. Just so I'm clear, you have no</p> <p>16 personal knowledge from Commanding Officer</p> <p>17 Eddis, what meetings he attended or did not; is</p> <p>18 that correct?</p> <p>19 A. My knowledge came from Bernie</p> <p>20 Prazenica and Ron Rabena.</p> <p>21 Q. Apart from being excluded from the</p> <p>22 meetings, and Bernie not shaking your hand, what</p> <p>23 other incidents can you identify where you felt</p> <p>24 you were treated differently because of being</p> <p>25 Latina or a female, by PAL?</p>	<p style="text-align: right;">Page 124</p> <p>1 E. CINTRON</p> <p>2 that behavior. You're condoning the behavior</p> <p>3 when I tell you that the PAL headquarters</p> <p>4 civilian staff are constantly saying racial</p> <p>5 jokes and innuendos, and you think it's funny,</p> <p>6 and you tell me that it's okay for them to say</p> <p>7 whatever they want to say because they can say</p> <p>8 whatever they want to say. And when you don't</p> <p>9 take action to rectify that behavior in your</p> <p>10 employees, then you're condoning it.</p> <p>11 And part of that -- being exposed to that</p> <p>12 was me, as a commanding officer, when people</p> <p>13 make comments like, "your officer is retarded,"</p> <p>14 and things like that, that they were saying at</p> <p>15 meetings.</p> <p>16 Q. Who is the "they"?</p> <p>17 A. Or they would request specific</p> <p>18 officers to go to certain meetings because of</p> <p>19 their color.</p> <p>20 Q. Do you feel that any of that conduct</p> <p>21 was targeted towards you?</p> <p>22 A. I believe that they were sending</p> <p>23 a -- the wrong message, that being inclusive is</p> <p>24 not important in the community that we serve,</p> <p>25 that it's okay to allow women to feel like they</p>
<p style="text-align: right;">Page 123</p> <p>1 E. CINTRON</p> <p>2 A. That -- can you repeat that</p> <p>3 question? Because it seems like it's the same</p> <p>4 question.</p> <p>5 Q. Well, so sure. Let me -- so let</p> <p>6 me -- I'll try to explain it this way: What I'm</p> <p>7 trying to find out from you is instances where</p> <p>8 you felt you were treated differently because</p> <p>9 you are either Latina or a female. And we have</p> <p>10 talked about a couple. Right? You said, I was</p> <p>11 excluded from the meetings, and that Bernie did</p> <p>12 not shake your hand.</p> <p>13 What I'm trying to find out, are there any</p> <p>14 other things that you can say: This</p> <p>15 event occurred, and I felt treated differently</p> <p>16 because I am either a Latina or a female?</p> <p>17 A. Yes. As I mentioned earlier, when</p> <p>18 Deputy Commissioner Sullivan enters an office</p> <p>19 where Bernie Prazenica and Ron Rabena is</p> <p>20 standing, along with -- I mean, Ted Qualli was</p> <p>21 not there. It was Bernie Prazenica and Ron</p> <p>22 Rabena, were standing, and I'm being told what</p> <p>23 she has to say doesn't matter, and I'm being</p> <p>24 flagged, something that they would not do to a</p> <p>25 male commander, and you laugh, you're condoning</p>	<p style="text-align: right;">Page 125</p> <p>1 E. CINTRON</p> <p>2 are less than what they are, even though they</p> <p>3 worked just as hard as men to achieve where they</p> <p>4 are at. And I wasn't treated as my male</p> <p>5 counterpart by Bernie and Ron, or Ted for</p> <p>6 that matter.</p> <p>7 Q. Who is the male counterpart that</p> <p>8 you're identifying?</p> <p>9 A. I'm talking about anybody in the</p> <p>10 room. If they came in, they spoke to the men,</p> <p>11 they didn't speak to me. Bernie wouldn't even</p> <p>12 speak to me and not even shake my hand or</p> <p>13 acknowledge me. They wouldn't invite me to the</p> <p>14 meetings to -- for me to get information about</p> <p>15 the programs I'm supposed to run or make a</p> <p>16 decision on the funding, or help with the needs</p> <p>17 of PAL in the community. Like, I was totally</p> <p>18 excluded. What other reason would it be other</p> <p>19 than to exclude me because I am a woman? And</p> <p>20 they made it a point to send another woman to</p> <p>21 tell me to stay out of it and let the men run</p> <p>22 it.</p> <p>23 Q. And that's what Maureen Rush told</p> <p>24 you?</p> <p>25 A. Yes, as per her, it was the message</p>

<p style="text-align: right;">Page 126</p> <p>1 E. CINTRON</p> <p>2 she was relaying from Bernie and Ron Rabena.</p> <p>3 Q. Did Bernie ever tell you that they</p> <p>4 sent Maureen Rush to deliver that message to</p> <p>5 you?</p> <p>6 A. No. She told me. She confirmed it.</p> <p>7 Q. Did Ron or Ted ever tell you that</p> <p>8 they sent her to deliver the message?</p> <p>9 A. No. But Ted was the one that</p> <p>10 delivered the message under false pretense that</p> <p>11 I was meeting with her for programs.</p> <p>12 (Email is received and marked as</p> <p>13 Exhibit PAL-5 for identification, as</p> <p>14 of this date.)</p> <p>15 Q. This, Ms. Cintron, if you -- this</p> <p>16 was produced separately, but I believe it's</p> <p>17 related to PAL-3, looks to be -- they have the</p> <p>18 same subject matter and time frame.</p> <p>19 A. Yes.</p> <p>20 Q. And in PAL-3, it says: Does the</p> <p>21 time on 10/24 work for you? This was a date</p> <p>22 proposed by Ms. Faust. And in PAL-5, Ted</p> <p>23 responds to you -- PAL-5 is the one I just gave</p> <p>24 you.</p> <p>25 A. This one?</p>	<p style="text-align: right;">Page 128</p> <p>1 E. CINTRON</p> <p>2 recall Ted, Bernie, or Ron, anyone at PAL</p> <p>3 treating you unfairly because it was, in your</p> <p>4 opinion, due to your being Latina or female?</p> <p>5 A. Yes.</p> <p>6 Q. What's that?</p> <p>7 A. When we were returning from a</p> <p>8 meeting, Ted explained that he was upset about</p> <p>9 the memorandum of understanding. I believe that</p> <p>10 was the same meeting where we had brought</p> <p>11 Commissioner Ross about the memorandum of</p> <p>12 understanding, and while we were riding back in</p> <p>13 the car, he stated, You're -- the only reason</p> <p>14 why you're at PAL is because the commissioner</p> <p>15 wanted you to represent the community we serve.</p> <p>16 He said, But you're meant to be seen, not heard.</p> <p>17 And then he said, What the commissioner</p> <p>18 wants doesn't matter because PAL runs -- runs</p> <p>19 the unit. He said, And the board is the final</p> <p>20 decision-makers. He was talking about the board</p> <p>21 being the decision-makers.</p> <p>22 Q. Do you know who the commanding</p> <p>23 officer of PAL is now?</p> <p>24 A. No.</p> <p>25 Q. Do you know who the commanding</p>
<p style="text-align: right;">Page 127</p> <p>1 E. CINTRON</p> <p>2 Q. Yup. If you look in the middle. It</p> <p>3 says L-T. I assume -- it's my interpretation</p> <p>4 he's referring to you as Lieutenant. He says:</p> <p>5 Unfortunately, that time does not work for me as</p> <p>6 I have a meeting in Bala Cynwyd.</p> <p>7 And so was it your understanding that Ted</p> <p>8 would be participating in a meeting with you and</p> <p>9 Maureen Rush?</p> <p>10 A. No.</p> <p>11 Q. Is it your opinion that you're</p> <p>12 excluded from meetings, and Bernie wouldn't</p> <p>13 shake your hand, and the other things you just</p> <p>14 listed -- it's your opinion that that was due to</p> <p>15 your being Latina and a woman, correct?</p> <p>16 A. Yes.</p> <p>17 Q. And so your conclusions are based</p> <p>18 upon your interpretation and belief?</p> <p>19 A. No, based on my observations.</p> <p>20 Q. And so in those meetings, is it your</p> <p>21 testimony that Bernie would refuse to shake the</p> <p>22 woman -- the hand of any woman?</p> <p>23 A. I would see him shake other women's</p> <p>24 hands.</p> <p>25 Q. Is there anything else where you can</p>	<p style="text-align: right;">Page 129</p> <p>1 E. CINTRON</p> <p>2 officer of PAL was immediately after you left?</p> <p>3 A. I don't recall the name, but I do</p> <p>4 know that Commissioner Ross has selected a black</p> <p>5 male to -- captain to take my place once I left.</p> <p>6 After that, they put a white female, Captain</p> <p>7 Campbell, who is now Deputy Commissioner</p> <p>8 Campbell, which was Sullivan's first choice to</p> <p>9 be at PAL when he tried to eliminate me, get rid</p> <p>10 of me when he came to PAL.</p> <p>11 Q. That was Deputy Commissioner</p> <p>12 Campbell?</p> <p>13 A. She's currently the Deputy</p> <p>14 Commissioner Campbell.</p> <p>15 Q. And who -- was it your testimony</p> <p>16 that Sullivan hired her to be the -- or promoted</p> <p>17 her, chose her to be the --</p> <p>18 A. No, I'm not saying that. What I'm</p> <p>19 saying is that when Sullivan first got to PAL,</p> <p>20 one, he requested to overseeing the Police</p> <p>21 Athletic League unit. He immediately started</p> <p>22 to -- went to Commissioner Ross, requesting that</p> <p>23 I be replaced. He went to Commissioner</p> <p>24 Patterson to oversee the unit voluntarily. Then</p> <p>25 he went to Commissioner Ross and tried to get me</p>

<p style="text-align: right;">Page 130</p> <p>1 E. CINTRON</p> <p>2 removed without cause and bring in another</p> <p>3 commander.</p> <p>4 And once Commissioner Ross left, they</p> <p>5 placed Captain Campbell in my position. Someone</p> <p>6 that Commissioner Sullivan told not to speak to</p> <p>7 me in reference to a PAL matter, in reference to</p> <p>8 the grand opening of the 26th District. She was</p> <p>9 an ally working with me to get the center open.</p> <p>10 And after, the community sent a letter to</p> <p>11 Councilwoman Maria Quinones, that PAL had</p> <p>12 received over \$250,000 to open a center in the</p> <p>13 26th District three years prior, and had not</p> <p>14 utilized the money for that purpose.</p> <p>15 Because she was the captain in the 26th</p> <p>16 District, me and her were working together to open</p> <p>17 up that center, to get that center working, up and</p> <p>18 running, because after I located a location to get</p> <p>19 the center up and running, some repairs needed to</p> <p>20 be made before we could open the doors, for which</p> <p>21 Ted Qualli and the board did not want to spend the</p> <p>22 money to make the repairs, so that the center could</p> <p>23 be safe before we opened up the doors.</p> <p>24 I went and talked to someone I knew in the</p> <p>25 painters union, who donated over \$30,000 of</p>	<p style="text-align: right;">Page 132</p> <p>1 E. CINTRON</p> <p>2 A. The Police Athletic League was given</p> <p>3 over \$250,000 for the purpose of opening a</p> <p>4 center in the 26th District three years prior.</p> <p>5 And I was familiar with this because they</p> <p>6 originally approached me. Captain Cappy had</p> <p>7 called me because at the time I was the director</p> <p>8 or the coordinator of the Police Explorers</p> <p>9 program at the 25th District. And he called me.</p> <p>10 He said, Hey, we have a donor that wants to give</p> <p>11 money to the Police Explorers and to PAL. And I</p> <p>12 referred them to give that money to -- to go</p> <p>13 through Finance to give that money. And they</p> <p>14 referred the family to PAL, to donate the</p> <p>15 portion they wanted to make -- to donate to PAL</p> <p>16 directly. And that was three years prior.</p> <p>17 That's why I had knowledge of it, and prior to</p> <p>18 being the commanding officer at PAL.</p> <p>19 And there was a letter sent to the</p> <p>20 councilwoman in reference to PAL not taking</p> <p>21 action to open up that center. Because Captain</p> <p>22 Campbell and I were trying to get a center</p> <p>23 opened, we were trying to work with Ted Qualli,</p> <p>24 Bernie Prazenica, and Ron to get these repairs</p> <p>25 done to get the center opened, and it became a</p>
<p style="text-align: right;">Page 131</p> <p>1 E. CINTRON</p> <p>2 paint to get the gym painted, and labor to get</p> <p>3 work done as far as all the painting was</p> <p>4 concerned.</p> <p>5 I was concerned because there was a</p> <p>6 bathroom that was a unisex bathroom by the doors</p> <p>7 that led to the outside alley, a door that the</p> <p>8 building owners wanted to keep open for safety</p> <p>9 reasons. But it was known that there was -- the</p> <p>10 homeless people would sneak into the building</p> <p>11 through that same door to sleep in the building,</p> <p>12 so it would have been unsafe for the kids to</p> <p>13 have to use that bathroom, away from the</p> <p>14 officers' view. And I requested that the</p> <p>15 bathroom be either relocated or some form of</p> <p>16 door to -- that we can secure that door somehow.</p> <p>17 And request that an officer for -- an office for</p> <p>18 the officer, as well as a game -- a computer</p> <p>19 room for the kids. And they didn't want to</p> <p>20 spend the money to get those corrections done</p> <p>21 before we opened up the center, even though they</p> <p>22 had that endowment that was given to them for</p> <p>23 that purpose.</p> <p>24 Q. Who is the "they"? Is that Ron,</p> <p>25 Bernie, and Ted?</p>	<p style="text-align: right;">Page 133</p> <p>1 E. CINTRON</p> <p>2 to-do because they didn't want to spend the</p> <p>3 money fixing up the things that needed to be</p> <p>4 fixed.</p> <p>5 Q. You said that when Deputy</p> <p>6 Commissioner Sullivan came in, he tried to get</p> <p>7 you removed without cause and bring in another</p> <p>8 commander. Who was that commander?</p> <p>9 A. I don't know, but I believe it was</p> <p>10 Captain Campbell, because shortly after that, he</p> <p>11 called Captain Campbell and told her not to</p> <p>12 speak to me, and not to get involved in the</p> <p>13 situation involving the 26th District grand</p> <p>14 opening.</p> <p>15 I know this because I spoke to her after a</p> <p>16 meeting that we had at the 26th District, and</p> <p>17 she told me, I got to stay away from you. I</p> <p>18 just got reamed down. The commissioner doesn't</p> <p>19 want me to talk to you. And I'm just going to</p> <p>20 stay out of it.</p> <p>21 He then called the sergeants to his</p> <p>22 office, as well, and he was basically telling</p> <p>23 people to stay out of -- basically to isolate me</p> <p>24 and not talk to me, and siding with the board on</p> <p>25 these matters.</p>

<p style="text-align: right;">Page 134</p> <p>1 E. CINTRON</p> <p>2 Q. Captain Campbell is a female; is</p> <p>3 that correct?</p> <p>4 A. Yes.</p> <p>5 Q. And she's Caucasian?</p> <p>6 A. Yes.</p> <p>7 Q. Are you aware of anyone at PAL</p> <p>8 trying to have you replaced?</p> <p>9 A. Anyone at PAL trying to have me</p> <p>10 replaced?</p> <p>11 Q. Right. So you said that Deputy</p> <p>12 Commissioner Sullivan had wanted to have you</p> <p>13 removed. Is there anyone at PAL that wanted to</p> <p>14 have you removed?</p> <p>15 A. Ted Qualli, Bernie, and Ron.</p> <p>16 Q. And how do you know that?</p> <p>17 A. Because they were going to</p> <p>18 Commissioner Sullivan and advocating for changes</p> <p>19 to be made because of me speaking up, and</p> <p>20 talking about the problems, you know, the</p> <p>21 deplorable conditions at the centers.</p> <p>22 Q. How do you know that they went to</p> <p>23 Sullivan and asked for that?</p> <p>24 A. Prior to Sullivan coming over to</p> <p>25 PAL, we were at the 25th District PAL for an</p>	<p style="text-align: right;">Page 136</p> <p>1 E. CINTRON</p> <p>2 asked Sullivan to have you removed?</p> <p>3 A. Yes, because when DC Sullivan</p> <p>4 attempted to have me removed, and I had a</p> <p>5 conversation with him in the office, he</p> <p>6 mentioned, You know, the board is not happy with</p> <p>7 you. And they don't want you there. They want</p> <p>8 you removed.</p> <p>9 And he -- but he never mentioned that he</p> <p>10 tried to get me removed. I received that</p> <p>11 information from Patterson when he informed me</p> <p>12 that Sullivan was going to take over PAL.</p> <p>13 Q. So I want to isolate a sentence.</p> <p>14 Sullivan told you that the PAL board was, quote,</p> <p>15 not happy with you, correct?</p> <p>16 A. Yes.</p> <p>17 Q. Leave that phrase aside for a</p> <p>18 second. Did Sullivan ever tell you that Bernie,</p> <p>19 Ted, or Ron specifically wanted you removed?</p> <p>20 A. Yes. He said -- he said, You know,</p> <p>21 they don't want you there.</p> <p>22 Q. Okay. When did he say that?</p> <p>23 A. At the -- during the conversation</p> <p>24 that I had with him. And I didn't even know</p> <p>25 about the fact that he already had actually went</p>
<p style="text-align: right;">Page 135</p> <p>1 E. CINTRON</p> <p>2 event, and Ron Rabena and Ted -- Ron Rabena and</p> <p>3 Bernie Prazenica were speaking and they knew,</p> <p>4 before I knew, that Sullivan was going to be in</p> <p>5 charge of PAL. Bernie made a comment and said,</p> <p>6 How about that? We are getting our boy to be</p> <p>7 Deputy Commissioner and requesting to oversee</p> <p>8 PAL. And he mentioned that he hopes it happens</p> <p>9 because at least Sullivan would look out in</p> <p>10 their best interest.</p> <p>11 Q. What I want to know, though, is how</p> <p>12 do you know that they, the three of them asked</p> <p>13 Sullivan to remove you? Did any of them tell</p> <p>14 you that they asked for that?</p> <p>15 A. They never asked for that. But once</p> <p>16 Sullivan was in his position as deputy</p> <p>17 commissioner, he was abusing his authority as a</p> <p>18 commissioner, and instead of speaking to me on</p> <p>19 PAL matters, he was going directly to the board</p> <p>20 and speaking with them. And then all of a</p> <p>21 sudden, I'm being -- I'm the subject of an</p> <p>22 investigation for something I reported.</p> <p>23 Q. Okay. What I'm trying to ask you is</p> <p>24 not that question. It is: Did -- do you have</p> <p>25 firsthand knowledge that Bernie, Ted, or Ron</p>	<p style="text-align: right;">Page 137</p> <p>1 E. CINTRON</p> <p>2 and tried to get me removed.</p> <p>3 Q. And did he ever tell you that they</p> <p>4 don't want you there because you're Latina?</p> <p>5 A. They didn't say that.</p> <p>6 Q. Did he ever --</p> <p>7 A. I mean, he didn't say that to me.</p> <p>8 He just said they don't want me there -- They</p> <p>9 don't want you there.</p> <p>10 Q. And did he ever tell you that they</p> <p>11 didn't want you there because of your gender?</p> <p>12 A. He never said that, either.</p> <p>13 Q. Now, you mentioned that the -- you</p> <p>14 were speaking up about the deplorable conditions</p> <p>15 in some of these facilities; is that correct?</p> <p>16 A. Yes.</p> <p>17 Q. And is it your understanding that</p> <p>18 that's why the board was not happy with you?</p> <p>19 A. They were not happy because I would</p> <p>20 ask them to get some of these things resolved.</p> <p>21 And a lot of times when I would try to get</p> <p>22 things resolved, like getting some emergency</p> <p>23 situations taken care of, I was put through a</p> <p>24 loop as to who is going to approve for an</p> <p>25 electrical outlet that's sparking fire, to get</p>

<p style="text-align: right;">Page 138</p> <p>1 E. CINTRON</p> <p>2 fixed, for two weeks. And when I tried to order</p> <p>3 an electrician to get it fixed, Sunny Lee, who</p> <p>4 is the chief financial officer, said Oh, I'm</p> <p>5 going to go look at it. And I'm like, Are you</p> <p>6 an electrician? Because if you're not, what we</p> <p>7 need is an electrician to go fix an outlet</p> <p>8 that's sparking fire.</p> <p>9 So they would put all of these barriers,</p> <p>10 is what they were doing, for me to be able to do</p> <p>11 my job effectively, when it came to trying to</p> <p>12 make the center safe.</p> <p>13 Q. So they were frustrated with your</p> <p>14 efforts to make the centers operate safely?</p> <p>15 A. They were -- I wouldn't say that</p> <p>16 they were -- my efforts to make the centers</p> <p>17 safely. They were frustrated about the finances</p> <p>18 behind -- or having to spend money to get some</p> <p>19 of these things fixed. And had their -- and, in</p> <p>20 my opinion, had their priorities in the wrong</p> <p>21 place.</p> <p>22 When I was trying to get an electrician to</p> <p>23 fix a faulty -- faulty wires at the center, that</p> <p>24 the officers couldn't use because it was</p> <p>25 sparking -- sparking, Ted Qualli said, Oh, they</p>	<p style="text-align: right;">Page 140</p> <p>1 E. CINTRON</p> <p>2 I mentioned to you that I had with Sullivan.</p> <p>3 Q. Okay. Did any of them, directly to</p> <p>4 you, encourage you to resign your post?</p> <p>5 A. Sullivan -- when I spoke to</p> <p>6 Sullivan, he asked me why won't I just pick</p> <p>7 another unit and go. Like, he offered me to</p> <p>8 pick another unit.</p> <p>9 Q. So then Bernie, Ted, or Ron never</p> <p>10 had a -- they never encouraged you to leave?</p> <p>11 A. No. They would go through DC</p> <p>12 Sullivan to address me on those matters.</p> <p>13 Q. Do you know that they went to DC</p> <p>14 Sullivan to have you leave?</p> <p>15 A. Yes. According to Sullivan, he</p> <p>16 said, I spoke with the board. They don't want</p> <p>17 you there. But Commissioner Ross doesn't want</p> <p>18 to move you.</p> <p>19 Q. And do you -- can you give me an</p> <p>20 approximation of when that conversation with DC</p> <p>21 Sullivan occurred?</p> <p>22 A. All of this began as soon as he got</p> <p>23 there. He got there, and he was trying to get</p> <p>24 rid of me. He was trying to circumvent me. He</p> <p>25 isolated me by telling people not to speak to</p>
<p style="text-align: right;">Page 139</p> <p>1 E. CINTRON</p> <p>2 are not -- maintenance is not going to go over</p> <p>3 there. They have to paint a wall at</p> <p>4 headquarters.</p> <p>5 So, to me, it was a power struggle on</p> <p>6 Ted's behalf, that if I said, Let's go fix an</p> <p>7 outlet, Ted was saying, No, I need them to paint</p> <p>8 a wall, because we are getting some visitors at</p> <p>9 headquarters this week.</p> <p>10 So, to me, that's misplacement. He's</p> <p>11 abusing his authority, one, and misplacing where</p> <p>12 the -- the needs are real, if that makes any</p> <p>13 sense.</p> <p>14 Q. Did anyone from PAL -- let me ask</p> <p>15 this. Did Ron Rabena -- did Ron, Ted, or Bernie</p> <p>16 have the authority to remove you as commanding</p> <p>17 officer?</p> <p>18 A. No.</p> <p>19 Q. Did any of them --</p> <p>20 A. They have a say, because just like</p> <p>21 they could recommend who comes in, they</p> <p>22 recommend who leaves.</p> <p>23 Q. Are you aware of any of those three</p> <p>24 ever recommending that you be removed?</p> <p>25 A. All I know is the conversation that</p>	<p style="text-align: right;">Page 141</p> <p>1 E. CINTRON</p> <p>2 me. He began doing a lot of things to take my</p> <p>3 workload off. He was reassigning my jobs or my</p> <p>4 initiatives. And he was utilizing my resources</p> <p>5 to enhance his own foundation.</p> <p>6 Q. What evidence do you have that he</p> <p>7 used PAL resources to enhance his own</p> <p>8 foundations?</p> <p>9 A. It took me about a year to finally</p> <p>10 start the Police Blue Cadets Drum Line. It's</p> <p>11 public knowledge, because it's all over the</p> <p>12 media, that they performed their first, you</p> <p>13 know, I guess, their first time at the PAL</p> <p>14 dinner. And at that dinner, my -- Deputy</p> <p>15 Commissioner Sullivan spoke to my Blue Cadets</p> <p>16 Drum Line director. Afterwards, the next day,</p> <p>17 Sullivan called me and was asking me where does</p> <p>18 the officer, the director of the drum line work.</p> <p>19 And he asked me for the officer's information.</p> <p>20 He then contacted that officer. The officer</p> <p>21 stopped coming to PAL to do his weekly classes</p> <p>22 with the PAL kids, stating that he was busy and</p> <p>23 that he had gotten hurt at work, and he couldn't</p> <p>24 practice with the kids no more.</p> <p>25 The next thing I know, the officer is on</p>

<p style="text-align: right;">Page 142</p> <p>1 E. CINTRON</p> <p>2 the news with Sullivan, because Sullivan started</p> <p>3 his own drum line for his organization, and they</p> <p>4 debuted at the Irish Day Parade. And the person</p> <p>5 that was teaching his kids was my director that</p> <p>6 he stole from me, basically. So, as a result, I</p> <p>7 couldn't find someone else to replace the</p> <p>8 officer, and we couldn't continue with the</p> <p>9 program.</p> <p>10 When I saw Sullivan, not knowing that he</p> <p>11 was utilizing my director to form his own drum</p> <p>12 line, I asked him, Hey, my drum line director</p> <p>13 said he's hurt, and he can't teach kids how</p> <p>14 to -- you know, like, continue teaching the</p> <p>15 kids. And I said, Would it be possible if I</p> <p>16 could send a citywide message asking any other</p> <p>17 officer if they will volunteer to teach the</p> <p>18 kids -- teach kids to replace this other</p> <p>19 officer? And at no time did Sullivan tell me</p> <p>20 that he was utilizing my director for his own --</p> <p>21 building his own drum line. And he said to me,</p> <p>22 I don't care, do it if you want. Like, he</p> <p>23 didn't even care that the drum line was falling</p> <p>24 apart, as someone that's supposed to be</p> <p>25 responsible of the PAL unit. But at the same</p>	<p style="text-align: right;">Page 144</p> <p>1 E. CINTRON</p> <p>2 A. Because I spoke to DC Patterson when</p> <p>3 he instructed me that PAL -- that Sullivan</p> <p>4 requested to oversee PAL. And he informed him.</p> <p>5 Q. So Sullivan wanted to oversee PAL,</p> <p>6 but --</p> <p>7 A. And he wanted to bring someone of</p> <p>8 his choosing to PAL. Not just my position, but</p> <p>9 he also tried to bring someone -- his own wife</p> <p>10 to work at police headquarters near him.</p> <p>11 Q. And the individual that Sullivan</p> <p>12 wanted to replace you with was a female captain,</p> <p>13 correct?</p> <p>14 A. I'm not sure. But when I spoke to</p> <p>15 Campbell later on, and she told me that he told</p> <p>16 her to stay out of it and not speak to me, she</p> <p>17 also mentioned that, you know, that it was</p> <p>18 better for her not to get involved, and that he</p> <p>19 will remember that she -- you know, if she</p> <p>20 stayed away. She says, So I'm just going to</p> <p>21 stay away because I don't want no more problems.</p> <p>22 Because I don't know what she interpreted by</p> <p>23 that.</p> <p>24 MR. GREEN: Excuse me. Can we</p> <p>25 take a break?</p>
<p style="text-align: right;">Page 143</p> <p>1 E. CINTRON</p> <p>2 time it was no surprise to him that I didn't</p> <p>3 have a director.</p> <p>4 And sure enough, two weeks later, they are</p> <p>5 all over the news that Sullivan started a new</p> <p>6 drum line program that mimicked my program, but</p> <p>7 for his foundation.</p> <p>8 Q. Did DC Sullivan have the authority</p> <p>9 to remove you from your post?</p> <p>10 A. No, because I was chosen by</p> <p>11 Commissioner Ross.</p> <p>12 Q. So --</p> <p>13 A. He can make recommendations, if he</p> <p>14 wanted to.</p> <p>15 Q. So that's the same then, Sullivan</p> <p>16 can make recommendations, but it is ultimately</p> <p>17 up to Ross to decide to remove you from the</p> <p>18 post?</p> <p>19 A. Yes, because my position, I was</p> <p>20 appointed to that position by Commissioner Ross.</p> <p>21 So he, in essence, selected me for that</p> <p>22 position. So Sullivan would have gone -- and</p> <p>23 did go to him to try and get me removed.</p> <p>24 Q. And how do you know that Sullivan</p> <p>25 went and tried to have you removed?</p>	<p style="text-align: right;">Page 145</p> <p>1 E. CINTRON</p> <p>2 MR. GOLDEN: Sure.</p> <p>3 THE VIDEOGRAPHER: The time is</p> <p>4 3:32. We are now off the record.</p> <p>5 (A break was taken.)</p> <p>6 (Family Leave of Absence Request</p> <p>7 is received and marked as Exhibit</p> <p>8 PAL-6 for identification, as of this</p> <p>9 date.)</p> <p>10 THE VIDEOGRAPHER: Time is 3:45.</p> <p>11 We are now on the record.</p> <p>12 Q. Ms. Cintron, I just introduced</p> <p>13 Exhibit PAL-6. Do you recognize -- is that your</p> <p>14 signature on that document?</p> <p>15 A. Yes.</p> <p>16 Q. And this is a request for leave, for</p> <p>17 FMLA leave starting on February 1st, 2018; is</p> <p>18 that correct?</p> <p>19 A. Yes.</p> <p>20 Q. And to whom did you submit this</p> <p>21 FMLA -- when I use the term FMLA, you understand</p> <p>22 that I mean the Family Medical Leave Act?</p> <p>23 A. Yes.</p> <p>24 Q. Do you recall to whom you submitted</p> <p>25 your FMLA leave request?</p>

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1 E. CINTRON

2 A. According to the policy, you submit

3 it to Personnel. Once they review it, they send

4 it to your supervisor.

5 Q. And so was that the -- you said --

6 A. So this was forwarded to Deputy

7 Commissioner Sullivan for approval.

8 Q. And so it was -- was it submitted --

9 it was submitted. Do you recall, did you submit

10 this in writing, like in person or by email? Do

11 you recall how you submitted it?

12 A. Oh, you have to take it in person.

13 Q. And to whom did you turn it in to?

14 Do you remember the name?

15 A. No. You just drop it off, and they

16 assign it to someone. And then when it goes

17 through the chain of command, they will notify

18 you if it got approved or denied.

19 Q. And so this was something you

20 submitted to the personnel unit within the city?

21 A. According to policy, yes.

22 Q. Did you have to submit this to

23 anyone with PAL?

24 A. No.

25 Q. And was this request for FMLA leave

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2 approved -- sorry, was the request for FMLA

3 leave, was it approved?

4 A. Yes.

5 Q. And do you know who was involved in

6 the decision to approve it?

7 A. Deputy Commissioner Sullivan.

8 Q. Anyone else that you know was

9 involved?

10 A. No. I believe that's the highest

11 level it has to go.

12 Q. Do you know if anybody from PAL was

13 involved in that process?

14 A. No.

15 Q. And you began your FMLA leave in

16 February of 2018; does that sound accurate?

17 A. Yes.

18 Q. And you were on leave for

19 approximately one year; is that correct?

20 A. Yes.

21 (Request to Separate is received

22 and marked as Exhibit PAL-7 for

23 identification, as of this date.)

24 Q. Ms. Cintron, is that your signature

25 at the bottom of that page or halfway through

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2 that form?

3 A. Yes.

4 Q. And is this -- the stated basis

5 is -- the reason for requesting separation is

6 retirement; is that accurate?

7 A. It was forced retirement, because I

8 exhausted all my family leave. And when

9 I requested for an extension to go on unpaid

10 status, Deputy Commissioner Coulter denied it.

11 Q. And how do you know that DC Coulter

12 denied it?

13 A. Because when I went to Internal

14 Affairs to do my exit interview, and I spoke to

15 Deputy Commissioner Wimberly, she informed me

16 that I had the right to extend my leave to an

17 unpaid status. And she called Deputy

18 Commissioner Coulter while I was there, and she

19 went to her office, and then she came back and

20 told me that Deputy Commissioner Coulter denied

21 the request.

22 She was actually encouraging me, Don't let

23 this -- don't let them do this to you, like,

24 don't give up on your career. I'm like, I don't

25 want to give up on my career, but I'm too ill to

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2 be at work. You know, like my PTSD, I can't --

3 they are not allowing me to go to work, and I'm

4 not physically capable to go to work right now

5 because of my medical condition.

6 Q. Did -- DC Coulter, that is a city

7 employee; is that correct?

8 A. She's a deputy commissioner. She

9 was. I think she's not -- I'm not sure if she's

10 here or not.

11 Q. At that time --

12 A. At that time.

13 Q. -- she was a city employee?

14 A. Yes.

15 Q. Did anyone from PAL, to your

16 knowledge, have involvement in the rejection of

17 your request for additional leave?

18 A. I don't know. They wouldn't have

19 the final say-so. The deputy makes the

20 determination.

21 Q. And when you say it was a forced

22 retirement, was it because you were not able to

23 return to work at that point?

24 A. I could have went on unpaid status,

25 but that was denied. So since medically I was

<p style="text-align: right;">Page 150</p> <p>1 E. CINTRON</p> <p>2 still dealing with my posttraumatic distress</p> <p>3 disorder and conditions, I couldn't come back to</p> <p>4 work because of how I was feeling. And in</p> <p>5 addition to that, my medical wouldn't approve</p> <p>6 for me to come back to work.</p> <p>7 Q. You mean the medical providers</p> <p>8 wouldn't clear your return?</p> <p>9 A. Yes. The person that I was seeing</p> <p>10 at Philmont.</p> <p>11 Q. Do you recall if there is -- like,</p> <p>12 do you recall any specific notes or documents</p> <p>13 that said you were not clear to return to work?</p> <p>14 A. What you mean, "not clear"?</p> <p>15 Q. So let me back up. When you go out</p> <p>16 on FMLA leave, not always, but you may say, I</p> <p>17 got a note from my doctor that says I need to</p> <p>18 take a certain amount of time off. What I'm</p> <p>19 asking you is, did anyone from Philmont give you</p> <p>20 a letter at that time saying you were not yet</p> <p>21 able to return to work?</p> <p>22 A. No. She -- I think she documented</p> <p>23 it on my records, but I don't know what she</p> <p>24 documented, but she expressed to me that given</p> <p>25 my medical condition and the fact that I was</p>	<p style="text-align: right;">Page 152</p> <p>1 E. CINTRON</p> <p>2 conflict of interest. Working with PAL, someone</p> <p>3 that does fundraising for you and donates over</p> <p>4 \$400,000 a year to your nonprofit organization.</p> <p>5 So he always was siding with the board because</p> <p>6 he wanted to stay in favor of the board.</p> <p>7 Ron Rabena does the biggest fundraiser for</p> <p>8 the Heroes Foundation, and part of that money</p> <p>9 goes to -- have been -- Deputy Commissioner</p> <p>10 Sullivan's foundation has been the recipient of</p> <p>11 that money, have gotten funded by that fund or</p> <p>12 charitable organization.</p> <p>13 Q. Are you saying that PAL itself, as</p> <p>14 an organization, donates \$400,000 to DC</p> <p>15 Sullivan's charity?</p> <p>16 A. No. What I'm saying is that Ron</p> <p>17 Rabena, a board member, runs a Heroes</p> <p>18 Scholarship Fund, and they donate to the police</p> <p>19 department fallen officers, as well as</p> <p>20 Sullivan's personal own foundation, nonprofit</p> <p>21 foundation. So Sullivan benefits from the money</p> <p>22 that he receives for his foundation to move his</p> <p>23 foundation forward by money that is being raised</p> <p>24 by Ron Rabena.</p> <p>25 Q. Do you know the name of DC</p>
<p style="text-align: right;">Page 151</p> <p>1 E. CINTRON</p> <p>2 still having a lot of problems, that she does</p> <p>3 not recommend for me to go back to work and to</p> <p>4 be exposed to the same unfavorable conditions.</p> <p>5 MR. GREEN: Off the record one</p> <p>6 second.</p> <p>7 THE VIDEOGRAPHER: The time is</p> <p>8 3:52. We are now off the record.</p> <p>9 (Whereupon, an off-the-record</p> <p>10 discussion was held.)</p> <p>11 THE VIDEOGRAPHER: The time is</p> <p>12 3:53. We are now on the record.</p> <p>13 Q. When you said that you couldn't</p> <p>14 return to work because of the unfavorable</p> <p>15 conditions, what were those -- what are</p> <p>16 those unfavorable conditions?</p> <p>17 A. Everything that I stated before. I</p> <p>18 could not go back to work to an environment that</p> <p>19 was hostile and where I was being isolated and</p> <p>20 being harassed and not know what -- what was</p> <p>21 going to happen to me, given the fact that, you</p> <p>22 know, my boss, the Deputy Commissioner Sullivan,</p> <p>23 was siding with the board because of the</p> <p>24 personal relationship they have of working</p> <p>25 together on Sullivan's nonprofit, which was a</p>	<p style="text-align: right;">Page 153</p> <p>1 E. CINTRON</p> <p>2 Sullivan's organization? Do you know what the</p> <p>3 name of it is?</p> <p>4 A. It's Children's Charitable</p> <p>5 Foundation. He's also in charge of the Heroes</p> <p>6 Scholarship, the heroes run where they do the</p> <p>7 bike runs. And PAL helps them with facilitating</p> <p>8 that run to the Atlantic City area, by allowing</p> <p>9 Sullivan to utilize the PAL vans to transport</p> <p>10 and to be used for that purpose that is not a</p> <p>11 PAL event.</p> <p>12 Q. Well, PAL is a charitable</p> <p>13 organization, correct?</p> <p>14 A. PAL is a children's --</p> <p>15 Q. A charitable organization.</p> <p>16 A. PAL?</p> <p>17 Q. Yes.</p> <p>18 A. PAL is a nonprofit organization to</p> <p>19 help children. I don't believe they are</p> <p>20 supposed to be donating forward donations that</p> <p>21 are given to them, but what I'm referring to is</p> <p>22 to the heroes dinner that is ran and operated by</p> <p>23 Ron Rabena, PAL board member.</p> <p>24 Q. Well, my question is, if PAL wants</p> <p>25 to allow it's vans to be used for another</p>

<p style="text-align: right;">Page 154</p> <p>1 E. CINTRON</p> <p>2 charity, why would you say that that's -- you</p> <p>3 know, something was wrong with that?</p> <p>4 A. Well, what I'm saying is that the</p> <p>5 PALs -- are bought for the purpose of</p> <p>6 transporting kids and families during PAL</p> <p>7 events. And Sullivan benefits from that because</p> <p>8 he didn't have to pay to have this big event</p> <p>9 every year because he utilizes the PAL vans.</p> <p>10 Q. Well, if the PAL vans aren't being</p> <p>11 used in -- for PAL events at that time, is there</p> <p>12 anything that would prevent them from being used</p> <p>13 by DC Sullivan?</p> <p>14 A. Well, in my opinion, if the vans are</p> <p>15 being bought for the use of transporting</p> <p>16 children, the wear and tear is at the cost of</p> <p>17 PAL, and that's less money that they can put</p> <p>18 into programs because the vans are not being</p> <p>19 used only internally.</p> <p>20 Q. Well, I hear you say that that's</p> <p>21 your opinion.</p> <p>22 A. So it's an additional cost. What</p> <p>23 I'm saying is it's an additional cost to PAL to</p> <p>24 maintain those vans on a yearly basis, when that</p> <p>25 money can be directed towards the programs for</p>	<p style="text-align: right;">Page 156</p> <p>1 E. CINTRON</p> <p>2 is the fact that Sullivan is abusing his</p> <p>3 authority by being -- and it's a conflict</p> <p>4 of interest for him to be in charge of PAL when</p> <p>5 he himself has a reason to side with the board</p> <p>6 and be in good standing with the board, even if</p> <p>7 that meant isolating me, because I made these</p> <p>8 complaints because it's not beneficial to him</p> <p>9 for him to lose funding for his charitable</p> <p>10 organization. It's a conflict of interest.</p> <p>11 He's not going to side with me when someone from</p> <p>12 the board is giving him -- you know, is</p> <p>13 selecting him to receive some of the funds that</p> <p>14 they get from that fundraiser.</p> <p>15 Q. How do you know, or who from the</p> <p>16 board decides what money to give to --</p> <p>17 A. I don't know. But I do know that</p> <p>18 Ron Rabena brags about it to me and said, Oh --</p> <p>19 just threw a paper on my desk when they were</p> <p>20 planning the event, and one day that he was at</p> <p>21 headquarters, and he threw it, and he said, Oh,</p> <p>22 this is where we give money to Sullivan's</p> <p>23 foundation -- before Sullivan came to PAL.</p> <p>24 Q. Do you know if DC Sullivan's charity</p> <p>25 compensates PAL in any way for its use of the</p>
<p style="text-align: right;">Page 155</p> <p>1 E. CINTRON</p> <p>2 the kids.</p> <p>3 Q. Are you --</p> <p>4 A. Instead of a deputy commissioner</p> <p>5 taking advantage of his authority to ask to</p> <p>6 borrow vans to run his own foundations or his</p> <p>7 own events.</p> <p>8 Q. Are you aware of any provisions in</p> <p>9 PAL's, you know, articles of incorporation or so</p> <p>10 on, that would prevent the use of the vans by DC</p> <p>11 Sullivan's charity?</p> <p>12 A. Well, their -- I don't know what's</p> <p>13 in their documents, but I know that Ted Qualli</p> <p>14 expressed numerous times that the vans should</p> <p>15 not be used for anything other than transporting</p> <p>16 kids to and from events. But yet they lend the</p> <p>17 vans to Deputy Commissioner Sullivan for his</p> <p>18 personal foundation.</p> <p>19 Q. And how did it come up with Ted that</p> <p>20 the vans should only be used for transporting</p> <p>21 kids?</p> <p>22 A. We spoke about it several times, and</p> <p>23 his thought on it is, It's the deputy, I'm not</p> <p>24 going to say no. But the problem is not the</p> <p>25 vans itself that I'm referring to. The problem</p>	<p style="text-align: right;">Page 157</p> <p>1 E. CINTRON</p> <p>2 vans?</p> <p>3 A. No, they don't.</p> <p>4 Q. How do you know that they don't?</p> <p>5 A. Because, as the commanding officer,</p> <p>6 I had to review the use of the vehicles, and any</p> <p>7 reimbursement will go through me so that I could</p> <p>8 submit it to Finance, and I never saw any</p> <p>9 reimbursement.</p> <p>10 Q. When do the -- when does this event</p> <p>11 occur? It's an annual event, correct?</p> <p>12 A. They do one annual event, but they</p> <p>13 also do other events as well.</p> <p>14 Q. And do you know when that annual</p> <p>15 event occurs?</p> <p>16 A. I'm not sure. I don't remember.</p> <p>17 Q. And so, in your recollection, there</p> <p>18 was never a time where you saw PAL being paid</p> <p>19 for the use of those vans; is that correct?</p> <p>20 A. No.</p> <p>21 Q. Is it possible other -- someone else</p> <p>22 could have handled that payment?</p> <p>23 A. No one handled that payment.</p> <p>24 Q. Who did -- did PAL have a treasurer?</p> <p>25 A. A treasurer. We have a -- they had</p>

<p style="text-align: right;">Page 158</p> <p>1 E. CINTRON</p> <p>2 a chief financial officer.</p> <p>3 Q. And who was that?</p> <p>4 A. Sunny Lee.</p> <p>5 Q. What are Sunny Lee's</p> <p>6 responsibilities?</p> <p>7 A. Well, they sometimes complained</p> <p>8 that, because of wear and tear, that the van</p> <p>9 shouldn't be lent out. And they mentioned how</p> <p>10 Sullivan would borrow the vans and use them for</p> <p>11 his events. But other than that, that's the</p> <p>12 only thing that I heard them talk about.</p> <p>13 Q. When you say "they," who's the</p> <p>14 "they"?</p> <p>15 A. Like Sunny Lee, Ted Qualli.</p> <p>16 Q. And so Sunny and Ted were</p> <p>17 complaining about Sullivan using the vans?</p> <p>18 A. It depends on the day. Sometimes</p> <p>19 they would complain that he wanted to borrow</p> <p>20 them, but they were -- willingly let them -- let</p> <p>21 him use it.</p> <p>22 Q. Did you have a vehicle that was</p> <p>23 provided to you by PAL when you were the</p> <p>24 commanding officer?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 160</p> <p>1 E. CINTRON</p> <p>2 Q. Oh, I'm sorry. So DC Sullivan</p> <p>3 influenced the sergeant's testimony with --</p> <p>4 A. He was -- he was controlling the</p> <p>5 investigation from his office, by telling people</p> <p>6 not to speak to me, to -- to say stuff that they</p> <p>7 said that wasn't accurate. And things like</p> <p>8 that. And after they went to -- after he</p> <p>9 ordered them to come to his office during the</p> <p>10 investigation to discuss an investigation, then</p> <p>11 some of their knowledge of what actually took</p> <p>12 place, to my surprise, changed when they went to</p> <p>13 Internal Affairs.</p> <p>14 Q. What about their testimony changed?</p> <p>15 A. Well --</p> <p>16 MR. GREEN: Objection. If you</p> <p>17 have a specific event that you want</p> <p>18 her to respond to in connection with</p> <p>19 that particular question, I think it</p> <p>20 would be more productive so that the</p> <p>21 objection now is based on relevancy</p> <p>22 grounds. If you can be a little bit</p> <p>23 more specific, perhaps you can be a</p> <p>24 little bit more informative.</p> <p>25 MR. GOLDEN: Sure. She said --</p>
<p style="text-align: right;">Page 159</p> <p>1 E. CINTRON</p> <p>2 Q. Did you ever use it for any</p> <p>3 non-PAL-related work?</p> <p>4 A. No.</p> <p>5 Q. So the only way you used that</p> <p>6 vehicle was for official PAL business?</p> <p>7 A. Yes.</p> <p>8 Q. You said that DC Sullivan isolated</p> <p>9 you for your complaints. Those are your</p> <p>10 complaints about the poor condition of the PAL</p> <p>11 facilities; is that correct?</p> <p>12 A. It was everything that I would go to</p> <p>13 him, that was going wrong at PAL. And he would</p> <p>14 dismiss me, and nothing got resolved. So the</p> <p>15 unfavorable conditions continued to escalate,</p> <p>16 and it became a more hostile -- it kept getting</p> <p>17 more hostile and hostile to the point where Ted</p> <p>18 Qualli would come into my office and yell at me.</p> <p>19 He called the sergeants to his office and was</p> <p>20 influencing their testimony or their interviews</p> <p>21 at Internal Affairs.</p> <p>22 Q. How do you know that Ted influenced</p> <p>23 their testimony within Internal Affairs?</p> <p>24 A. I didn't say Ted. I said Sullivan,</p> <p>25 DC Sullivan.</p>	<p style="text-align: right;">Page 161</p> <p>1 E. CINTRON</p> <p>2 and I can have it read back -- that</p> <p>3 she was -- that the two sergeants</p> <p>4 changed their -- was it testimony?</p> <p>5 And so what -- my question to that</p> <p>6 is what testimony changed?</p> <p>7 That's -- that's -- she's saying</p> <p>8 something changed, and what I'm</p> <p>9 asking is, what specifically -- if</p> <p>10 she has something specific, what is</p> <p>11 it that changed?</p> <p>12 MR. GREEN: You mean in</p> <p>13 connection with an investigation at</p> <p>14 that particular time?</p> <p>15 MR. GOLDEN: I don't know.</p> <p>16 That's what I'm asking --</p> <p>17 MR. GREEN: All right.</p> <p>18 A. Well, they were misreporting the</p> <p>19 things that were happening at PAL, after they</p> <p>20 got called to Sullivan's office.</p> <p>21 Q. Can you tell me the things that they</p> <p>22 were misreporting?</p> <p>23 A. They were blatantly lying to the</p> <p>24 deputy. I had two sergeants there when I first</p> <p>25 arrived to PAL. And for the most part, they</p>

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2 were both there because of someone they knew on

3 the board. And because of some type of

4 relationship, they -- they were there.

5 The one sergeant was neighbors with Deputy

6 Commissioner Patterson, which was Sergeant

7 Irving. And Sergeant Faust is really good

8 friends with a lot of board members. And the

9 sergeants are inept. Like they don't properly

10 supervise. They are insubordinate. They

11 violate orders. And -- and when I reported all

12 of these incidents to Deputy Commissioner

13 Sullivan, instead of taking remedial actions

14 against the sergeants, he began to utilize them

15 and call them to his office to further his

16 advances to isolate me, by telling Sergeant

17 Pascucci not to speak to me, and to stay away

18 from me, even though I'm Sergeant Pascucci's

19 immediate supervisor.

20 He basically opened up the doors for

21 Sergeant Faust to be blatantly disrespectful and

22 say things like, Oh, nothing is going to happen

23 to me. The commissioner is my buddy, you know.

24 And things like that.

25 I overheard the sergeant talking to Keith

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2 Balcom, who was an officer and who he considers

3 a friend, talk about how him and the deputy were

4 discussing the whole situation, with me being

5 the target of an investigation at Internal

6 Affairs based on some lies. And when I

7 communicated this with DC Sullivan, again, he

8 failed to take action about anything that the

9 sergeant did. When I tried to discipline the

10 sergeant for other infractions, he protected the

11 sergeant and told me not to write him up for

12 anything and to leave him alone.

13 And some of the stuff that I was

14 explaining to the deputy were serious

15 complaints. And the deputy would not take me

16 seriously, and was basically giving Sergeant

17 Faust leeway to be disrespectful and disobey my

18 orders and jump the chain of command. And for

19 someone that I had heard the deputy say that he

20 didn't like, in the past, so it was strange to

21 me that he made a comment in -- at an event,

22 prior to him becoming the deputy of PAL, that he

23 hated Sergeant Faust, but all of a sudden they

24 became friends after Sergeant Faust went to his

25 office, and he was instructing him what to say

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2 at -- during an investigation. He was

3 manipulating the investigation from the third

4 floor.

5 And to the point where when I spoke to

6 Conway, which is the detective conducting the

7 investigation, he -- who had expressed to me

8 that he attempted to close out my case or the

9 allegations against me as false, but that the

10 deputy told him to, keep digging. You got to

11 find something on her. And he attempted to

12 close the case three times, and the deputy

13 wouldn't let him.

14 Q. Who told you that?

15 A. Detective Conway, the investigator.

16 During this conversation, he also told me

17 that he sees a, you know -- I forget the term

18 that he used, but he said he sees a setup --

19 like, he's been doing investigative work for so

20 long that he sees -- that he knows when someone

21 is just trying to, like, find something, even

22 though there's nothing there to find.

23 And he expressed to me, I don't mind going

24 up against a deputy when they are in the wrong.

25 And he's the one that told me to file an EEOC

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2 complaint with the city, and that he would

3 follow up with the investigation.

4 And prior to that, when Sullivan was doing

5 all the stuff that he was doing, I attempted to

6 go to DC Patterson through the chain of command,

7 according to our policy, to report Sullivan.

8 But Sullivan had -- saw me enter the third

9 floor, which is where their offices are at. And

10 as soon as I went into Deputy Commissioner

11 Patterson's office, after setting up an

12 appointment to report Sullivan, Patterson

13 literally was out-talking me and saying, I don't

14 want to hear it, I don't want to hear it. He

15 wants you to go back to him. Referring to

16 Deputy Commissioner Sullivan. And he kept

17 ordering me to shut up and go back to Sullivan.

18 And basically leaving me no recourse to follow

19 the chain of command to report the person who is

20 involved in the cause of their investigation --

21 I mean, the cause of the harassment and

22 discrimination.

23 Q. Did you report your concerns about

24 DC Sullivan to the city's Equal Opportunity

25 office, the EEO office?

<p style="text-align: right;">Page 166</p> <p>1 E. CINTRON</p> <p>2 A. Yes. Once I exhausted all the ways</p> <p>3 that I can go about trying to find remedial</p> <p>4 action to take place within the department, and</p> <p>5 being ordered by Sullivan not to speak to any of</p> <p>6 the deputies or to ever speak to the</p> <p>7 commissioner again, I had no choice but to go to</p> <p>8 the city, because when Conway told me that I</p> <p>9 should file one through the department, because</p> <p>10 Sullivan was already interfering in the current</p> <p>11 investigation, I didn't trust for the City to</p> <p>12 handle it and, therefore, I went outside of the</p> <p>13 department to file my EEOC complaint.</p> <p>14 Q. So what I -- just so I understand</p> <p>15 this, if you want to look at Number 2 -- this is</p> <p>16 the complaint --</p> <p>17 A. You gave it to me?</p> <p>18 Q. Yes. Yep. You are looking at it</p> <p>19 right in front of you. It's -- can you turn to</p> <p>20 page 9? Yep, you got it. Yep.</p> <p>21 A. Okay.</p> <p>22 Q. Page 9, and paragraph 59.</p> <p>23 A. Yes.</p> <p>24 Q. And it says that you orally</p> <p>25 complained to the City's Office of Equal</p>	<p style="text-align: right;">Page 168</p> <p>1 E. CINTRON</p> <p>2 investigation on me. So I didn't trust for --</p> <p>3 for a proper investigation to be conducted</p> <p>4 without his interference.</p> <p>5 Q. You had mentioned a short time ago,</p> <p>6 Sergeant Irving, Sergeant Faust, and Sergeant</p> <p>7 Pascucci.</p> <p>8 A. Yes.</p> <p>9 Q. Were those all sergeants operating</p> <p>10 in the PAL unit?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. So I thought you had just</p> <p>13 maybe -- so when you -- when you became the</p> <p>14 commanding officer, who were the sergeants at</p> <p>15 that time?</p> <p>16 A. Sergeant Irving and Sergeant Faust.</p> <p>17 Q. And did Sergeant Pascucci replace</p> <p>18 one of them?</p> <p>19 A. No. I had requested a third</p> <p>20 sergeant, and they -- and Deputy Commissioner</p> <p>21 Patterson approved for me to get a third</p> <p>22 sergeant.</p> <p>23 Q. And, again, so as it relates to the</p> <p>24 appointment of personnel in the PAL unit, that's</p> <p>25 something that the Deputy Commissioner needs to</p>
<p style="text-align: right;">Page 167</p> <p>1 E. CINTRON</p> <p>2 Employment Opportunity. And so do you recall</p> <p>3 that complaint?</p> <p>4 A. That's the conversation I had with</p> <p>5 Conway. He brought me the forms and told me</p> <p>6 that he felt that I had enough basis to file an</p> <p>7 EEO complaint, and asked me, did I want to file</p> <p>8 one at that time.</p> <p>9 Q. So Conway gave you the forms that</p> <p>10 you could --</p> <p>11 A. Under the deputy commissioner's</p> <p>12 instruction that was assigned to the Internal</p> <p>13 Affairs, which was Deputy Commissioner Wimberly.</p> <p>14 W-I-M-B-E-R-L-Y.</p> <p>15 Q. And so then am I accurate that you</p> <p>16 did not complete the form that Conway provided</p> <p>17 you?</p> <p>18 A. No.</p> <p>19 Q. Maybe -- let me ask it -- did you</p> <p>20 complete that form?</p> <p>21 A. No.</p> <p>22 Q. Why is it that you did not complete</p> <p>23 that form?</p> <p>24 A. Because Deputy Commissioner Sullivan</p> <p>25 was already controlling the allegations in the</p>	<p style="text-align: right;">Page 169</p> <p>1 E. CINTRON</p> <p>2 approve, or the commissioner?</p> <p>3 A. Yes. I did a manpower projection</p> <p>4 and the names of the unit, and we needed a</p> <p>5 second -- we actually need two sergeants on the</p> <p>6 street so that one could oversee the east side</p> <p>7 of the city and the other one could oversee the</p> <p>8 west side of the city, without being overwhelmed</p> <p>9 and being able to visit the centers.</p> <p>10 Q. You mentioned that DC Sullivan</p> <p>11 influenced what they said during the Internal</p> <p>12 Affairs investigation. Did either of the</p> <p>13 sergeants tell you that?</p> <p>14 A. Yes. Well, I overheard Sergeant</p> <p>15 Faust's conversation with Keith. And Sergeant</p> <p>16 Pascucci told me, as soon as he came back from</p> <p>17 the deputy's office, that the deputy was</p> <p>18 basically telling him, Watch what you say at</p> <p>19 Internal Affairs. And told him, you know, We</p> <p>20 are trying to get Cintron, the lieutenant. And</p> <p>21 he stated, So stay out of it, and don't talk to</p> <p>22 her about any of that.</p> <p>23 Someone that I brought to the unit as the</p> <p>24 sergeant -- like, I was the one that did his</p> <p>25 interview and brought to the unit, who I</p>

<p style="text-align: right;">Page 170</p> <p>1 E. CINTRON</p> <p>2 considered as an ally, because he also</p> <p>3 experienced everything that was going on at PAL,</p> <p>4 and he also was having problems with Ted Qualli</p> <p>5 and Chase Trimmer and the officers, you know,</p> <p>6 being out of control and problems with the other</p> <p>7 sergeant, Sergeant Faust.</p> <p>8 Q. Is Sergeant Pascucci, is that a male</p> <p>9 or a female?</p> <p>10 A. Male.</p> <p>11 Q. And what is his ethnicity?</p> <p>12 A. White.</p> <p>13 Q. So a white male was also having</p> <p>14 problems with people at PAL?</p> <p>15 A. He was having problems with the</p> <p>16 staff. With, you know, condescending remarks,</p> <p>17 you know, civilians versus cops type of</p> <p>18 mentality. Instead of working together.</p> <p>19 Q. So that was -- so you're saying the</p> <p>20 civilian versus the cops, the civilians are the</p> <p>21 PAL staff, and then the cops are the individuals</p> <p>22 in your unit; is that correct?</p> <p>23 A. The officers assigned to PAL, yes.</p> <p>24 This was something that was going on before I</p> <p>25 got there. It's, like, the officers felt that</p>	<p style="text-align: right;">Page 172</p> <p>1 E. CINTRON</p> <p>2 doing with the kids, without anybody consulting</p> <p>3 them or talking to them about it first. So</p> <p>4 that's where the animosity was coming in, and</p> <p>5 that was something that was going on that Ted</p> <p>6 brought to my attention when I first got to PAL.</p> <p>7 So this was something that was going on way</p> <p>8 before I got there.</p> <p>9 Q. Thank you. And then -- but you</p> <p>10 said -- so it was going on before you got there.</p> <p>11 And then you and Ted were talking about how it</p> <p>12 could be --</p> <p>13 A. How we can get them together, yes.</p> <p>14 Q. And -- but you said the problem</p> <p>15 continued to the extent where Sergeant Pascucci</p> <p>16 also observed the issue?</p> <p>17 A. Yes. He also had problems with -- I</p> <p>18 believe he had problems with Chase. He</p> <p>19 submitted several memos about incidents that</p> <p>20 happened between the officers and civilians.</p> <p>21 Q. The -- we have talked today about</p> <p>22 the complaints that you submitted -- I'm sorry.</p> <p>23 You were complaining about the conditions of PAL</p> <p>24 centers and how they were -- you know, some of</p> <p>25 them were not in good condition. There were</p>
<p style="text-align: right;">Page 171</p> <p>1 E. CINTRON</p> <p>2 PAL's nonprofit was doing a civilian takeover by</p> <p>3 replacing them with civilian staff. And they</p> <p>4 didn't get along with the civilian staff because</p> <p>5 the civilian staff was taking over their duties</p> <p>6 that they enjoyed doing. And the civilian staff</p> <p>7 didn't get along with the officers because the</p> <p>8 officers, you know, since they report to the</p> <p>9 police, wouldn't take their request seriously.</p> <p>10 So it was kind of like a battle between both</p> <p>11 parties, which is why we needed the Memorandum</p> <p>12 of Understanding to be in place, so that there</p> <p>13 could be clear lines as to who is supposed to be</p> <p>14 doing what.</p> <p>15 Q. You said that there were battles</p> <p>16 about who the officers report to, or who the</p> <p>17 civilians report to?</p> <p>18 A. Not who they report to. Like, for</p> <p>19 instance, Ted would tell one of his staff, let's</p> <p>20 say Chase, I want you to go to Paley PAL and --</p> <p>21 and implement this program.</p> <p>22 And the cops didn't like the fact that the</p> <p>23 civilians would go over there and try to</p> <p>24 implement programs or take over programs that</p> <p>25 they were already running, that they enjoyed</p>	<p style="text-align: right;">Page 173</p> <p>1 E. CINTRON</p> <p>2 some funding issues. There was a center that</p> <p>3 wasn't open.</p> <p>4 Can you tell me, were there any other</p> <p>5 complaint you recall submitting about how PAL's</p> <p>6 operations were inadequate, in your opinion?</p> <p>7 A. Yes. I submitted several memos to</p> <p>8 the Deputy Commissioner, explaining how Ted and</p> <p>9 I could not see eye to eye on certain issues</p> <p>10 pertaining to budget or pertaining to the</p> <p>11 programs and things of that nature. Like, we</p> <p>12 would try to handle it internally, but after Ted</p> <p>13 would receive his, I guess, request from the</p> <p>14 board as to what they wanted, he was adamant</p> <p>15 about implementing things the way he wanted it,</p> <p>16 even though some of those things violated</p> <p>17 departmental policy, one of which was paying the</p> <p>18 officers \$25 under the table to work PAL events</p> <p>19 on the weekend when they were supposed to be</p> <p>20 off.</p> <p>21 And when I got there, I was like, this, we</p> <p>22 cannot do this because the officers have to get</p> <p>23 paid their right salary, and they have to get</p> <p>24 paid through the city.</p> <p>25 When I asked Ted, had they coordinated</p>

<p style="text-align: right;">Page 174</p> <p>1 E. CINTRON</p> <p>2 payment through police finance, where they have</p> <p>3 to create an account, they told me they had.</p> <p>4 But when I called the Police Finance, they told</p> <p>5 me that nothing was ever filed with them, and</p> <p>6 therefore, the city had been paying overtime</p> <p>7 money for PAL events.</p> <p>8 The one event was in excess of \$8,000. So</p> <p>9 Patterson had to take from other money to pay --</p> <p>10 you know, to cover the cost of several events,</p> <p>11 and he was upset, and he said that PAL has to</p> <p>12 establish the account with finance so that they</p> <p>13 can start paying their share of overtime for the</p> <p>14 police officers. And, in fact, after that, he</p> <p>15 said that the police was not going to cover any</p> <p>16 more overtime, any events that the PAL decides</p> <p>17 to plan on the weekend, knowing that the</p> <p>18 officers are off on the weekend, and that they</p> <p>19 are not supposed to be working on the weekend,</p> <p>20 especially not in uniform while getting paid</p> <p>21 under the table.</p> <p>22 Q. So is it safe to say that your</p> <p>23 disagreements with Ted were about the management</p> <p>24 of PAL?</p> <p>25 A. My disagreement was the way they</p>	<p style="text-align: right;">Page 176</p> <p>1 E. CINTRON</p> <p>2 he had arranged for me to have with Sullivan, to</p> <p>3 discuss everything that I had discussed with</p> <p>4 him, pertaining to PAL, and all the problems and</p> <p>5 things that I had reported.</p> <p>6 He also said, I already gave him a</p> <p>7 heads-up and filled him in, but you can fill in</p> <p>8 the details. And he set up a meeting for me to</p> <p>9 sit down with Sullivan when he first began to</p> <p>10 oversee PAL. So DC Sullivan was well aware of</p> <p>11 everything that was going on at PAL from the</p> <p>12 first day.</p> <p>13 Q. When you submitted the request to</p> <p>14 separate, was that something you tendered in</p> <p>15 person or by mail? Do you remember how you --</p> <p>16 A. No. This is what they make you sign</p> <p>17 at Internal Affairs. They gave you this</p> <p>18 paperwork. I did this at my separation or at</p> <p>19 personnel. I can't remember who I signed this</p> <p>20 through.</p> <p>21 Q. But was it in a city office?</p> <p>22 A. It was at the PAB. It would have</p> <p>23 been the PAB. I believe this is something I</p> <p>24 signed either at the PAB or when I went to see</p> <p>25 the retirement people. I'm not sure where they</p>
<p style="text-align: right;">Page 175</p> <p>1 E. CINTRON</p> <p>2 would handle things like that situation. I was</p> <p>3 simply informing them, Ted Qualli and the board,</p> <p>4 that there was a process to having the officers</p> <p>5 work on the weekend, and the process was to</p> <p>6 establish an account with police finance so that</p> <p>7 the officers could get properly paid at their</p> <p>8 rate of salary, as well as be covered in case</p> <p>9 something happens, because while they are in</p> <p>10 uniform, if something happens when they are not</p> <p>11 supposed to be working, who is going to cover</p> <p>12 the family of a fallen officer.</p> <p>13 So those were the issues that I was</p> <p>14 concerned with. But Ted Qualli and Ron Rabena</p> <p>15 would insist and continue to schedule these</p> <p>16 events, you know, when officers weren't working.</p> <p>17 And that's where the problems came to be.</p> <p>18 Q. Was there anyone at PAL -- do you</p> <p>19 recall the date of the last complaint you made</p> <p>20 to DC Patterson about the issues you were having</p> <p>21 at PAL?</p> <p>22 A. DC Patterson had called me up there</p> <p>23 to -- basically to summarize everything that</p> <p>24 needed to happen during the transition. And he</p> <p>25 told me to make sure that I have a sit-down that</p>	<p style="text-align: right;">Page 177</p> <p>1 E. CINTRON</p> <p>2 had me sign this form.</p> <p>3 Q. So, forgive me, but for the record,</p> <p>4 can you explain what PAB means?</p> <p>5 A. The Police Administration Building.</p> <p>6 Q. What's the address for that?</p> <p>7 A. 8th and Race.</p> <p>8 Q. Thank you.</p> <p>9 Did you -- when you made the decision to</p> <p>10 separate from your employment, apart from this</p> <p>11 form, did you tell anyone else at the city?</p> <p>12 A. Yes. I went through the process</p> <p>13 that I had to go through to retire, which meant</p> <p>14 I had to inform police personnel my intent to</p> <p>15 leave. I had to inform Deputy Commissioner</p> <p>16 Sullivan. And they give you a packet that you</p> <p>17 fill out, and you bring back in two weeks. And</p> <p>18 by then police personnel makes all the</p> <p>19 arrangement to begin the process of retirement,</p> <p>20 such as setting up a meeting with central</p> <p>21 personnel, setting up for you to discuss</p> <p>22 compensation that you would get after you leave,</p> <p>23 with police personnel, and things of that</p> <p>24 nature; how much you will get for retirement and</p> <p>25 all of that.</p>

<p style="text-align: right;">Page 178</p> <p>1 E. CINTRON</p> <p>2 Q. Did you receive any compensation</p> <p>3 from the city upon your retirement?</p> <p>4 A. Unfortunately, when I retired, I</p> <p>5 couldn't receive what I would have received if I</p> <p>6 stayed the four years drop, or had I finished my</p> <p>7 career as I intended to do until this happened.</p> <p>8 And so I only got whatever I had left in the</p> <p>9 books as far as my vacation time, I think it</p> <p>10 was.</p> <p>11 Q. Like, accrued PTO time?</p> <p>12 A. Yeah, whatever accrued time I still</p> <p>13 had.</p> <p>14 Q. And that was provided --</p> <p>15 A. I think it was -- it wasn't even</p> <p>16 that. It was -- let me clarify that.</p> <p>17 I had exhausted all my sick time and</p> <p>18 vacation during my family leave, so the only</p> <p>19 thing I got was a partial of that drop money,</p> <p>20 which was like 30-something thousand dollars.</p> <p>21 Q. And the drop was paid to you by the</p> <p>22 city, correct?</p> <p>23 A. Yes.</p> <p>24 Q. Do you --</p> <p>25 A. Had I officially signed up for the</p>	<p style="text-align: right;">Page 180</p> <p>1 E. CINTRON</p> <p>2 A. I only get my pension check which is</p> <p>3 4,900 a month.</p> <p>4 Q. And that's from the city, correct?</p> <p>5 A. Which -- yes, which averages out to</p> <p>6 like 59,60 a year, which is half of the salary I</p> <p>7 was earning as a lieutenant.</p> <p>8 Q. And so that's a benefit paid to you</p> <p>9 by the city, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Following your retirement, did you</p> <p>12 receive anything compensation-wise from PAL?</p> <p>13 A. No.</p> <p>14 MR. GOLDEN: It's about 3:30</p> <p>15 [sic]. Why don't we take a</p> <p>16 five-minute break. I'm going to try</p> <p>17 to see what I've got left.</p> <p>18 THE VIDEOGRAPHER: Time is 4:32.</p> <p>19 We are now off the record.</p> <p>20 (A break was taken.)</p> <p>21 THE VIDEOGRAPHER: The time is</p> <p>22 4:50. We are now on the record.</p> <p>23 (Email is received and marked as</p> <p>24 Exhibit PAL-8 for identification, as</p> <p>25 of this date.)</p>
<p style="text-align: right;">Page 179</p> <p>1 E. CINTRON</p> <p>2 drop and waited four years, it would have been</p> <p>3 in excess of almost 400,000, which I wasn't</p> <p>4 planning to do at the time, because I was</p> <p>5 planning to continue to go up the ranks and stay</p> <p>6 with the department for a long time to come.</p> <p>7 Q. Do you receive any -- well, while</p> <p>8 you were employed with the city, did you</p> <p>9 contribute to a -- like a delayed benefit, like</p> <p>10 a pension plan, or did you receive any</p> <p>11 pension --</p> <p>12 A. Well, that was the pension money</p> <p>13 that I received, because I didn't sign up for</p> <p>14 the drop program, which is a city program where</p> <p>15 you give them a date that you will retire or</p> <p>16 leave, and based on -- they average out the time</p> <p>17 and give you a lump sum when you leave.</p> <p>18 Q. So if I heard that correctly, that</p> <p>19 was what you get instead of the pension</p> <p>20 payments?</p> <p>21 A. No. You still get your pension</p> <p>22 check. The drop money, what they call the drop</p> <p>23 money is something different.</p> <p>24 Q. And are you receiving anything</p> <p>25 through that pension?</p>	<p style="text-align: right;">Page 181</p> <p>1 E. CINTRON</p> <p>2 Q. Ms. Cintron, we -- Ms. Cintron, I</p> <p>3 just introduced PAL-8. It's an email that</p> <p>4 appears to be sent from -- it's an -- appears to</p> <p>5 be an AOL email address to Greg Doran. Is that</p> <p>6 an email that you sent to Mr. Doran?</p> <p>7 A. I sent this email to Mr. Doran as</p> <p>8 per his request. He specifically told me what</p> <p>9 he needed in the letter in order to release my</p> <p>10 commission check, which I never received.</p> <p>11 Q. So this was a -- it's something that</p> <p>12 he asked you to send him?</p> <p>13 A. Specifically as is worded.</p> <p>14 Q. Okay. So what, did he say it over</p> <p>15 the phone with you?</p> <p>16 A. He said, I need to put that, as per</p> <p>17 our conversation, it will mean that you're</p> <p>18 resigning and, you know, exactly what's here.</p> <p>19 He basically told me that he needed that in</p> <p>20 order for me leave the company in good standing,</p> <p>21 for me to get my check.</p> <p>22 Q. And did you say that he still did</p> <p>23 not give you the check?</p> <p>24 A. That's correct. I never received my</p> <p>25 check.</p>

<p style="text-align: right;">Page 182</p> <p>1 E. CINTRON</p> <p>2 Q. And did you ever follow up with him</p> <p>3 to find out why it wasn't paid?</p> <p>4 A. Yeah. He never responded to my</p> <p>5 calls.</p> <p>6 Q. Now, earlier, you mentioned that</p> <p>7 Mr. Doran spoke with DC Coulter; is that</p> <p>8 correct?</p> <p>9 A. Yes.</p> <p>10 Q. Do you know if Mr. Doran spoke with</p> <p>11 anyone from PAL about you?</p> <p>12 A. I don't know but -- I guess you guys</p> <p>13 have this email I sent him.</p> <p>14 Q. So apart from this email, are you</p> <p>15 aware of -- just so I'm clear, are you aware of</p> <p>16 any conversations Mr. Doran had with anyone else</p> <p>17 from PAL about you?</p> <p>18 A. No. The only thing I knew was what</p> <p>19 Jeff told me, which was that he spoke to</p> <p>20 Coulter.</p> <p>21 Q. Just so -- I don't know. Do you</p> <p>22 remember when you last held your position with</p> <p>23 the city, do you remember what your salary was?</p> <p>24 A. It was, like, 50-something, 57 --</p> <p>25 Q. And --</p>	<p style="text-align: right;">Page 184</p> <p>1 E. CINTRON</p> <p>2 Police, and basically that's what determines our</p> <p>3 pay grade.</p> <p>4 Q. Do you know -- so is it an agreement</p> <p>5 between the -- forgive me, I don't know the</p> <p>6 actual name, but is it an agreement between the</p> <p>7 FOP and the union? Or who is that -- whose --</p> <p>8 A. No. That isn't how it works. Like,</p> <p>9 the city has a base pay, depending on your rank,</p> <p>10 the amount of years. There's a scale that they</p> <p>11 go by to pay you your salary. But every year</p> <p>12 the fraternal order of police may negotiate a</p> <p>13 pay rate, a percentage.</p> <p>14 Q. Okay. And so that something, the</p> <p>15 pay rate, is set by the city, correct?</p> <p>16 A. Yes.</p> <p>17 Q. When you were the commanding officer</p> <p>18 of PAL, did PAL have anything to do with how</p> <p>19 your pay was set?</p> <p>20 A. No.</p> <p>21 Q. When you were with the city, do you</p> <p>22 know, did they maintain a personnel file on you?</p> <p>23 A. Yes. They maintain a personnel file</p> <p>24 on everyone.</p> <p>25 Q. Do you know if PAL maintained a</p>
<p style="text-align: right;">Page 183</p> <p>1 E. CINTRON</p> <p>2 A. -- dollars an hour.</p> <p>3 Q. Oh, \$57 an hour?</p> <p>4 A. Yes.</p> <p>5 Q. And then annualized?</p> <p>6 A. I was up to like, 115; with</p> <p>7 overtime, up to 120.</p> <p>8 Q. Sorry. I asked a poor question.</p> <p>9 So when you say -- so 57 an hour, and then</p> <p>10 that would be -- you would work like a 40 -- did</p> <p>11 you work a 40-hour workweek?</p> <p>12 A. Yes.</p> <p>13 Q. And then you would receive, like,</p> <p>14 overtime?</p> <p>15 A. Yes.</p> <p>16 Q. And then did you receive a bonus</p> <p>17 when you were working for the city?</p> <p>18 A. No. We don't receive bonuses.</p> <p>19 Q. And do you know who sets -- let me</p> <p>20 back up.</p> <p>21 Did you receive, like, annual increases in</p> <p>22 your hourly rate as you -- you know, over time?</p> <p>23 A. Yes. That's based on, like, the</p> <p>24 years you have on the job, any contractual</p> <p>25 agreements with the FOP, Fraternal Order of</p>	<p style="text-align: right;">Page 185</p> <p>1 E. CINTRON</p> <p>2 personnel file on you?</p> <p>3 A. I don't know.</p> <p>4 Q. Were there -- in terms of the issues</p> <p>5 that -- the treatment we talked about today, the</p> <p>6 problems you've had with the -- you know, the</p> <p>7 individuals that you've identified, can you</p> <p>8 recall any other incidents where you felt you</p> <p>9 were -- leaving aside what we have already</p> <p>10 talked about, I don't want to ask you that</p> <p>11 again, but are there any other incidents you</p> <p>12 recall where you felt you were treated in a</p> <p>13 discriminatory manner by anyone with PAL, apart</p> <p>14 from what we have already discussed today?</p> <p>15 A. That's what I recall as of the</p> <p>16 moment.</p> <p>17 Q. Okay.</p> <p>18 A. Like, right now, to be honest with</p> <p>19 you, I have a really bad headache, and I'm,</p> <p>20 like, from my anxiety, I'm getting jittery.</p> <p>21 MR. GOLDEN: Well, I would put on</p> <p>22 the record, by an agreement between</p> <p>23 counsel, we are going to stop for</p> <p>24 today. I know we have been here</p> <p>25 for a while. We are going to stop</p>

<p style="text-align: right;">Page 186</p> <p>1 E. CINTRON</p> <p>2 for today and we have agreed that if</p> <p>3 we need to continue, the idea will</p> <p>4 be for us to do it remotely so you</p> <p>5 would not need to come back in</p> <p>6 person. And counsel will be</p> <p>7 coordinating between themselves to</p> <p>8 set schedules and figure out what</p> <p>9 other remaining depositions need to</p> <p>10 be conducted between the parties.</p> <p>11 Ike, is that a fair --</p> <p>12 MR. GREEN: That's a fair</p> <p>13 assessment.</p> <p>14 MR. GOLDEN: Sharon, does that</p> <p>15 sound fair to you? We agree to --</p> <p>16 and we are also going to agree to --</p> <p>17 we're going to identify dates where</p> <p>18 witnesses -- availability of counsel</p> <p>19 and witnesses that we are all</p> <p>20 looking for so we can get that</p> <p>21 scheduled and, if need be, go back</p> <p>22 to the court.</p> <p>23 MR. GREEN: That's right.</p> <p>24 MR. GOLDEN: Sharon, is that all</p> <p>25 right?</p>	<p style="text-align: right;">Page 188</p> <p>1</p> <p>2 I N D E X</p> <p>3 WITNESS PAGE</p> <p>4 EVELYN CINTRON</p> <p>5</p> <p>6 By MR. GOLDEN 4</p> <p>7</p> <p>8 E X H I B I T S</p> <p>9</p> <p>10 FOR IDENT. DESCRIPTION PAGE</p> <p>11 Exhibit PAL-1 Off Duty Management letter 10</p> <p>12</p> <p>13 Exhibit PAL-2 First Amended Complaint 45</p> <p>14</p> <p>15 Exhibit PAL-3 Email 10/17/16 74</p> <p>16</p> <p>17 Exhibit PAL-4 Letter 92</p> <p>18</p> <p>19 Exhibit PAL-5 Email 126</p> <p>20</p> <p>21 Exhibit PAL-6 Family Leave of Absence Request 145</p> <p>22</p> <p>23 Exhibit PAL-7 Request to Separate 147</p> <p>24</p> <p>25 Exhibit PAL-8 Email 180</p>
<p style="text-align: right;">Page 187</p> <p>1</p> <p>2 MS. ULAK: Yes.</p> <p>3 MR. GOLDEN: Okay. And, with</p> <p>4 that, Ms. Cintron, we are done for</p> <p>5 today. Thank you very much.</p> <p>6 THE WITNESS: Okay. Thank you.</p> <p>7 THE VIDEOGRAPHER: The time is</p> <p>8 4:57. This now concludes the</p> <p>9 deposition for today.</p> <p>10</p> <p>11 (Time noted: 4:57 p.m.)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16 Sworn and subscribed to</p> <p>17 before me this ____ day of</p> <p>18 _____, _____.</p> <p>19</p> <p>20</p> <p>21 Notary Public</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 189</p> <p>1</p> <p>2 C E R T I F I C A T I O N</p> <p>3 I, CAROLYN C. CRESCIO, a Notary</p> <p>4 Public, within and for the State of</p> <p>5 Pennsylvania, do hereby certify that the</p> <p>6 foregoing witness, EVELYN CINTRON, was duly</p> <p>7 sworn on the date indicated, and that the</p> <p>8 foregoing is a true and accurate transcription</p> <p>9 of my stenographic notes.</p> <p>10 I further certify that I am not</p> <p>11 related to any of the parties to this action by</p> <p>12 blood or marriage; and that I am in no way</p> <p>13 interested in the outcome of this matter.</p> <p>14 IN WITNESS WHEREOF, I have hereunto</p> <p>15 set my hand this 28th day of October, 2022.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 190</p> <p>1 Issac Green, Esquire 2 ikegreen66@gmail.com 3 November 14, 2022 4 RE: Cintron, Evelyn v. City Of Philadelphia Et Al 5 10/28/2022, Evelyn Cintron (#5541591) 6 The above-referenced transcript is available for 7 review. 8 Within the applicable timeframe, the witness should 9 read the testimony to verify its accuracy. If there are 10 any changes, the witness should note those with the 11 reason, on the attached Errata Sheet. 12 The witness should sign the Acknowledgment of 13 Deponent and Errata and return to the deposing attorney. 14 Copies should be sent to all counsel, and to Veritext at 15 cs-midatlantic@veritext.com 16 17 Return completed errata within 30 days from 18 receipt of testimony. 19 If the witness fails to do so within the time 20 allotted, the transcript may be used as if signed. 21 22 Yours, 23 Veritext Legal Solutions 24 25</p>	<p style="text-align: right;">Page 192</p> <p>1 Cintron, Evelyn v. City Of Philadelphia Et Al 2 Evelyn Cintron (#5541591) 3 ACKNOWLEDGEMENT OF DEPONENT 4 I, Evelyn Cintron, do hereby declare that I 5 have read the foregoing transcript, I have made any 6 corrections, additions, or changes I deemed necessary as 7 noted above to be appended hereto, and that the same is 8 a true, correct and complete transcript of the testimony 9 given by me. 10 11 _____ 12 Evelyn Cintron Date 13 *If notary is required 14 SUBSCRIBED AND SWORN TO BEFORE ME THIS 15 _____ DAY OF _____, 20____. 16 17 18 _____ 19 NOTARY PUBLIC 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 191</p> <p>1 Cintron, Evelyn v. City Of Philadelphia Et Al 2 Evelyn Cintron (#5541591) 3 E R R A T A S H E E T 4 PAGE____ LINE____ CHANGE_____ 5 _____ 6 REASON_____ 7 PAGE____ LINE____ CHANGE_____ 8 _____ 9 REASON_____ 10 PAGE____ LINE____ CHANGE_____ 11 _____ 12 REASON_____ 13 PAGE____ LINE____ CHANGE_____ 14 _____ 15 REASON_____ 16 PAGE____ LINE____ CHANGE_____ 17 _____ 18 REASON_____ 19 PAGE____ LINE____ CHANGE_____ 20 _____ 21 REASON_____ 22 _____ 23 _____ 24 Evelyn Cintron Date 25</p>	

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[believe - call]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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